# BALDWIN HILLS SCENIC OVERLOOK

## Final Environmental Impact Report

State Clearinghouse No. 2003111098

Prepared for:

California Department of Parks and Recreation Southern Service Center 8885 Rio San Diego Drive, No. 270 San Diego, California 92108

Prepared by:
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March 2004

# FINAL ENVIRONMENTAL IMPACT REPORT PACIFIC DESIGN CENTER RED BUILDING AND SPECIFIC PLAN UPDATE

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## CHAPTER 1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared by the California Department of Parks and Recreation (Department) under the California Environmental Quality Act of 1970 (CEQA) Sections 15088, 15089, and 15132, for the Baldwin Hills Scenic Overlook Project. This Final EIR includes: Clarifications and Modifications, which describes the changes made to the Draft EIR; Response to Comments, which includes the Department's responses to all written comments received by agencies, private organizations, and the public during the 45-day public comment period; and the Mitigation Monitoring and Reporting Program, which lists all the mitigation measures required for implementation of the project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance.

#### 1.1 PROJECT LOCATION

The proposed project site is located in the Baldwin Hills area in southwestern Los Angeles County and is part of the 387-acre Kenneth Hahn State Recreation Area. The project area encompasses 58 acres of hillside terrain, which is primarily characterized by natural vegetation and undeveloped open space. The state-owned property is located within the City of Culver City and is adjacent to residential and commercial developments located in the Cities of Culver City, Los Angeles, and Inglewood.

#### 1.2 SUMMARY OF PROPOSED PROJECT

The purpose of the proposed project is to develop the 58-acre Baldwin Hills Scenic Overlook for use as a recreational area, as well as a natural resource educational/interpretive park for visitors and local schools. The project has four primary elements, the first of which is the development of public access to the property. Primary access to the park is via Hetzler Road, from Jefferson Boulevard. The entrance on Hetzler Road would be improved, and the roadway would be widened. The second element of the project would be to provide approximately 110 parking spaces for visitors. The parking would be divided between a lower lot located near the park entrance, and an upper lot located near the proposed visitor center. Both lots would provide ADA parking spaces and access. The third element of the project would be to construct a 10,300-square-foot visitor center. The visitor center would provide scenic views of the Los Angeles basin and the Pacific Ocean and would provide other important amenities such as interpretive and educational programs and facilities to park visitors. Other amenities provided at the proposed visitor center include picnic sites, scenic overlooks, and a 1,400-square-foot nourishment area. The nourishment area is a multiuse space and patio that is connected to the visitor center and has a capacity of approximately 80 people. The fourth element of the proposed project would provide protection and interpretation of the natural and cultural resources of the park and the adjacent Ballona

Creek. The project would restore the site's natural ridgelines and topography that were previously graded and would emphasize restoration of native coastal sage scrub habitat. Several public meetings and workshops have been held to solicit public input on the design of the proposed visitor center and site features.

The project area falls well below the nationally recommended standard of 6 to 10 acres of parkland per 1,000 people. The proposed project would provide much needed recreational and educational open space for residents who live in this highly under-served area. The scenic overlook would also provide pubic access to some of the most magnificent views in the metropolitan Los Angeles area.

#### 1.3 SUMMARY OF ALTERNATIVES CONSIDERED

The Draft EIR considered a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 15126.6(a) of the *State CEQA Guidelines*. As described below, the alternatives analyzed in this EIR include: the No Project Alternative (Alternative 1); Multiple Access Roads Alternative (Alternative 2); and Hillside Visitor Center Alternative (Alternative 3).

#### **No Project Alternative**

Under the No Project Alternative, the proposed visitor center would not be constructed, the roads would not be improved, parking would not be provided, and no site restoration would occur. The environmental characteristics would be generally the same as those described in the existing conditions sections of Chapter 3.0. Potential impacts associated with the proposed project would be avoided because no major development would occur on the project site under the No Project Alternative.

#### **Multiple Access Roads Alternative (Alternative 2)**

The Multiple Access Roads Alternative would provide a single entry point to the site from Jefferson Boulevard at the northeastern edge of the property. The road would split into two separate roads part way up the hill, allowing separate access for park visitors and adjacent residents (six residences, located on Hetzler Road and Tompkins Way). Decentralized parking would be provided in two locations. The visitor center would be located mid-way up the north-facing slope of the project area. Potential impacts associated with this alternative would be similar to those identified for the proposed project; however, neighborhood disruption would be reduced during park operation due to the separate residential access provided along Hetzler Road.

#### **Hillside Visitor Center Alternative (Alternative 3)**

The Hillside Visitor Center Alternative would nestle the visitor center into the hillside at the top of the scenic overlook site. Alternative 3 would provide site access via Jefferson Boulevard at Hetzler Road,

similar to the proposed project. The entrance would be widened and improved to provide safe access to and from the site. The six residents on Hetzler Road and Tompkins Way would use the same road as park visitors to access their homes. Potential impacts associated with this alternative would be similar to those identified for the proposed project and Alternative 2 above.

#### **Environmentally Superior Alternative**

The "No Project" alternative would be the environmentally superior alternative. However, in accordance with Section 15126.6(e)(2) of the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. In this case, the proposed project would result in potential impacts similar to or less (i.e., biological resources and public services) than those identified for Alternatives 2 and 3, but not the No Project Alternative. Therefore, the proposed project would be the environmentally superior alternative.

#### 1.4 NOTICING AND AVAILABILITY OF THE DRAFT EIR

The Draft EIR was circulated for public review and comment on January 8, 2004, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines. The document and Notice of Completion (NOC) was distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to over 500 interested parties and adjacent property owners and residents, which informed them of where they could view the document and how to comment. The purpose of the 45-day review period is to provide interested public agencies, groups and individuals the opportunity to comment on the contents and accuracy of the document. The document was available to the public at Culver City Julian Dixon Library, California State Parks Angeles District Headquarters, and the Park Ranger Station at the entrance of the park on Hetzler Road. A copy of the document was also posted online.

This document, together with the Draft EIR, makes up the Final EIR as defined in the *CEQA Guidelines*, Section 15132. The Final EIR will subsequently be reviewed by the Department for certification. Certification is not the same as approval, but marks the end of the environmental review phase. Certification is a judgment that the EIR is a legally adequate information document in compliance with CEQA. Only when the EIR document adequately identifies all significant environmental impacts associated with the project can it be used in the project approval phase, along with consideration of other relevant factors. To approve a project, CEQA requires that either the significant impacts of the project (as identified in the EIR) be reduced to a less than significant level through the implementation of mitigation measures, or the approving body must adopt a statement of overriding considerations, stating that mitigation measures do not exist or are infeasible thereby resulting in unavoidable significant impact(s). The statement of overriding considerations states, in effect, that the benefits of the project outweigh the

environmental impacts that would result upon implementation of the project. Because this project would not result in significant unavoidable impacts, a statement of overriding considerations is not required.

### CHAPTER 2.0 CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft EIR in response to the comments received during the public review period. These changes, in addition to the Draft EIR, constitute the Final EIR, to be presented to the Department for certification and approval.

The changes to the Draft EIR are listed by section, page number, and the comment that brought about the change, if applicable. Please refer to Section 3.0, Response to Comments, for referenced comment letters and corresponding comments.

#### **Section 0.0 Executive Summary**

#### Page Clarification/Revision

- ES-9 In response to Comment 6-2, the following Traffic/Transportation mitigation measure has been added to Table ES-1:
  - **TRA-2** Prior to operation of the park access road, the Department shall install appropriate signage along Hetzler Road prohibiting public parking. The "No Parking" zone shall extend from the intersection of Jefferson Boulevard to the upper parking lot.
- ES-10-12 In response to Comments 3-4, 3-5, 3-6, and 3-7, the following Air Quality mitigation measures have been modified or added to Table ES-1:
  - AIR-1 All heavy construction equipment shall be equipped with particulate filters, per the manufacture's instructions.
  - AIR-2 All heavy construction equipment shall be powered with low sulfur fuels, as feasible.
  - AIR-3 All equipment shall be properly tuned and maintained according to manufacturer's specifications.
  - AIR-4 All equipment shall use electricity from power poles rather than temporary diesel power generators to the extent feasible.
  - AIR-5 Trucks shall not idle for longer than 10 minutes.
  - AIR-6 Parking for construction vehicles shall be configured to minimize traffic interference.
  - AIR-7 Temporary traffic controls shall be implemented during all phases of construction to maintain a smooth traffic flow.

- AIR-8 Construction activities that affect traffic flow on the arterial system shall be scheduled for off-peak hour to the extent practicable.
- AIR-9 Construction trucks shall be rerouted away from congested streets or sensitive receptor areas.
- **AIR-10** Dedicated turn lanes shall be provided for movement of construction trucks and equipment on- and off-site.
- AIR-11 All heavy equipment shall be equipped with oxidation catalysts.
- AIR-12 Haul trucks shall be covered when loaded with fill.
- AIR-13 Surface of dirt piles shall be stabilized if not removed immediately using the following methods: enclose, cover, water twice daily, or apply non-toxic binders according to manufacturer's specifications.
- AIR-14 Paved streets shall be swept at least once per day with Rule 1186 compliant sweepers where there is evidence of dirt that has been carried onto the roadway or adjacent roadways.
- **AIR-15** Ground cover in disturbed areas shall be replaced as quickly as possible to prevent soil erosion.
- **AIR-16** For paved road track-out, all haul vehicles shall be covered.
- AIR-17 Construction activities shall be scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.
- AIR-18 Non-toxic stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for ten days or more) in accordance with manufacturer's specifications.
- AIR-19 Wheel washers shall be installed where vehicles enter and exit the construction site onto paved roads or trucks and equipment shall be washed off as they leave the site for each trip.
- AIR-20 A construction point-of-contact shall be appointed on-site to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.

During high wind conditions, defined as high winds less than 25 miles per hour, the following measures shall be implemented:

- AIR-21 All earthmoving activities shall be ceased or water shall be applied to soil not more than 15 minutes prior to moving such soil.
- AIR-22 For disturbed surfaces to be left inactive for several days, water shall be applied with a chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of 6 months; or chemical stabilizers shall be applied prior to wind event; or water shall be applied to all unstable disturbed areas three times per day; or a combination of these actions shall be implemented.

- AIR-23 For unpaved roads, chemical stabilizers shall be applied prior to wind event, or water shall be applied once per hour during active operation, or all vehicular traffic shall be stopped.
- AIR-24 For open storage piles, water shall be applied once per hour, or temporary coverings shall be installed.
- AIR-25 For high winds of 25 miles per hour or greater, all soil disturbance activities shall cease.
- ES-13 In response to Comment 9-4, the following Geology and Soils mitigation measure has been added to Table ES-1:

#### **Subsidence**

- GEO-3 The plans and specifications for the project shall be reviewed by a CEG to ensure that the soils conditions underlying the project site are suitable for development of the visitor center. This will include an evaluation of the potential for other organic material in the former landfill that may decompose and generate methane gas. Methane gas levels will be tested and subsidence levels will be estimated based on this information. If subsidence and/or methane gas levels are determined to require mitigation, measures shall be identified and incorporated into the project to reduce these impacts to acceptable levels. Such measures may include:
  - Excavation and recompaction of fill materials under the building foundation;
  - Building design modifications to avoid methane gas buildup and accumulation in the foundation and structure; and
  - Implementation of a methane gas monitoring program.

#### **Section 2.0 Project Description**

#### Page Clarification/Revision

In response to Comment 4-8, the second sentence in the last paragraph under Section 2.4.1, has been revised to read as follows:

"Formal trails would be established, as shown on Figure 2-4, which would connect the site to Jefferson Boulevard on the north, Culver City Park on the south, and Bowcroft Street on the east."

2-8 In response to Comment 4-22, the last paragraph under Section 2.4.3, has been revised to read as follows:

"It is not anticipated that a pumping station would be required to provide utility services for the proposed project. However, if a pump station is required for utility connections to the visitor center, the Department would locate the facility at least 100 feet from any residences, and shielding would be provided, as appropriate, to eliminate any potential noise impacts from the pump unit."

In response to Comment 4-10, the following text has been added to the end of the last paragraph on the page:

"In areas near residential zones (i.e., along Hetzler Road and near the Blair Hills community), the construction requirements and restrictions set forth in § 9.04.020 of the City's Municipal Code would be implemented by the Department. This could result in more restricted hours of construction in these areas."

2-11 In response to Comment 9-7, the following text has been added to the end of the first paragraph:

"Because the proposed parking lot would be larger than 5,000 square feet and have over 25 parking spots, a Standard Urban Stormwater Mitigation Plan (SUSMP) would also be required for project.

To minimize the off-site transport of pollutants from the proposed parking lot and to comply with the County-wide SUSMP requirements, the following measures would be required to be implemented as part of the proposed project (Cal/EPA Los Angeles RWQCB 2000):

- Reduce impervious land coverage of parking areas;
- Infiltrate runoff before it reaches the storm drain system;
- Treat runoff before it reaches the storm drain system;
- Regularly inspect parking lots for fluid leaks and spills and remove oil and petroleum hydrocarbons at parking lots that are heavily used. Follow procedures for proper disposal."

#### **Section 3.5 Transportation**

#### Page Clarification/Revision

3.5-17 In response to Comment 6-2, the following sentence has been added to the end of the second paragraph:

"Park visitors would be restricted from parking on Hetzler Road. A mitigation measure is provided to ensure that no parking would occur on Hetzler Road."

- 3.5-19 In response to Comment 6-2, the following mitigation measure has been added to Section 3.5.4, Mitigation Measures:
  - **TRA-2** Prior to operation of the park access road, the Department shall install appropriate signage along Hetzler Road to prohibiting public parking along the roadside. The "No Parking" zone shall extend from the intersection of Jefferson Boulevard to the upper parking lot.

#### **Section 3.6 Air Quality**

#### Page Clarification/Revision

3.6-3 In response to Comment 3-3, the following sentence been added above Table 3.6-3 as follows:

"The proposed project would occur in two phases. The first phase is site grading, and the second phase is building construction. The proposed project would be completed within approximately 12 months."

3.6-3 In response to Comment 3-3, Table 3.6-3 has been revised as follows:

**TABLE 3.6-3** ESTIMATED CONSTRUCTION EMISSIONS

		Estimated Emissions <sup>(1)</sup>			
	CO	ROC	NO <sub>x</sub>	$PM_{10}$	SO <sub>x</sub>
Phase I Site Grading					
Fugitive Dust	-	-	-	50.0	-
Off-Road Diesel	42.51	6.07	49.88	2.37	-
On-Road Diesel	8.23	2.19	49.65	1.16	0.63
Worker Trips	1.71	0.08	0.16	0.00	0.00
Maximum lbs/day	52.45	8.34	99.69	53.53	0.63
Phase II Building Construction					
Building Construction Off-Road Diesel	35.71	5.02	40.35	1.85	-
Asphalt Off-Gas	-	0.45	-	-	-
Asphalt Off-Road Diesel	60.03	7.26	48.10	2.12	-
Asphalt On-Road Diesel	0.40	0.11	2.14	0.05	0.03
Asphalt Worker Trips	0.40	0.03	0.02	0.01	0.00
Maximum lbs/day	96.55	12.88	90.61	4.03	0.03
Average Maximum Daily Emissions (lbs/day) (2)	96.55	12.88	99.69	53.53	0.63
Daily Thresholds for Construction Emissions (lbs/day)	550	75	100	150	150
Exceedance of Daily Thresholds (lbs/day)	0	0	0	0	0
Average Quarterly Emissions (tons/quarter)	1.05	0.17	1.44	1.48	0.01
Thresholds for Construction Emissions (tons/quarter)	24.75	2.5	2.5	6.75	6.75
Exceedance of SCAQMD Thresholds (tons/quarter)	0	0	0	0	0

Source: URBEMIS 2002 (Appendix E)

3.6-10 In response to Comments 3-4, 3-5, 3-6, and 3-7, several changes to the air quality mitigation measures have been incorporated into Section 3.6.4. To simplify these revisions, Section 3.6.4 has been replaced with the following:

#### **"3.6.4 Mitigation Measures**

The following mitigation measures shall be implemented during construction to ensure that NO<sub>x</sub> emissions remain below the level of significance:

- AIR-1 All heavy construction equipment shall be equipped with particulate filters, per the manufacture's instructions.
- AIR-2 All heavy construction equipment shall be powered with low sulfur fuels, as feasible.

An assumption was made that the construction period for the development of the visitor center and other park improvements would be approximately 12

months (264 construction days).

(2) Average maximum daily emissions represent the highest lbs/day for all construction phases.

- AIR-3 All equipment shall be properly tuned and maintained according to manufacturer's specifications.
- AIR-4 All equipment shall use electricity from power poles rather than temporary diesel power generators to the extent feasible.
- AIR-5 Trucks shall not idle for longer than 10 minutes.
- AIR-6 Parking for construction vehicles shall be configured to minimize traffic interference.
- AIR-7 Temporary traffic controls shall be implemented during all phases of construction to maintain a smooth traffic flow.
- AIR-8 Construction activities that affect traffic flow on the arterial system shall be scheduled for off-peak hour to the extent practicable.
- **AIR-9** Construction trucks shall be rerouted away from congested streets or sensitive receptor areas.
- **AIR-10** Dedicated turn lanes shall be provided for movement of construction trucks and equipment on- and off-site.
- **AIR-11** All heavy equipment shall be equipped with oxidation catalysts.

The following mitigation measures shall be implemented during construction to ensure that emissions of fugitive dust (including  $PM_{10}$  and  $PM_{2.5}$ ) remain below the level of significance:

- **AIR-12** Haul trucks shall be covered when loaded with fill.
- AIR-13 Surface of dirt piles shall be stabilized if not removed immediately using the following methods: enclose, cover, water twice daily, or apply non-toxic binders according to manufacturer's specifications.
- AIR-14 Paved streets shall be swept at least once per day with Rule 1186 compliant sweepers where there is evidence of dirt that has been carried onto the roadway or adjacent roadways.
- AIR-15 Ground cover in disturbed areas shall be replaced as quickly as possible to prevent soil erosion.
- **AIR-16** For paved road track-out, all haul vehicles shall be covered.
- AIR-17 Construction activities shall be scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.
- AIR-18 Non-toxic stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for ten days or more) in accordance with manufacturer's specifications.
- AIR-19 Wheel washers shall be installed where vehicles enter and exit the construction site onto paved roads or trucks and equipment shall be washed off as they leave the site for each trip.

AIR-20 A construction point-of-contact shall be appointed on-site to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.

During high wind conditions, defined as high winds less than 25 miles per hour, the following measures shall be implemented:

- AIR-21 All earthmoving activities shall be ceased or water shall be applied to soil not more than 15 minutes prior to moving such soil.
- AIR-22 For disturbed surfaces to be left inactive for several days, water shall be applied with a chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of 6 months; or chemical stabilizers shall be applied prior to wind event; or water shall be applied to all unstable disturbed areas three times per day; or a combination of these actions shall be implemented.
- AIR-23 For unpaved roads, chemical stabilizers shall be applied prior to wind event, or water shall be applied once per hour during active operation, or all vehicular traffic shall be stopped.
- AIR-24 For open storage piles, water shall be applied once per hour, or temporary coverings shall be installed.
- AIR-25 For high winds of 25 miles per hour or greater, all soil disturbance activities shall cease."

#### Section 3.7 Noise

#### Page Clarification/Revision

3.7-6 In response to Comment 4-9, the following information has been added to the end of the page under the header "City of Culver City Noise Ordinance":

"Section CCMC 9.04.20 of the City's Municipal Code regulated construction noise near residential zones as follows:

- 1. The use or operation of any automobile, motorcycle, engine, machine, or mechanical device, or other contrivance or facility, or the carrying on of any trade or business, causing between the hours of 7:00 p.m. and 8:00 a.m., any loud or unusual noise or sound, disturbing the peace of residents of a residentially zoned neighborhood.
- 2. The use of any of the foregoing in construction or excavation work between the hours of 7:00 p.m. and 8:00 a.m., on a weekday, or between the hours of 7:00 p.m. and 9:00 a.m. on a

Saturday, or between the hours of 7:00 p.m. and 10:00 a.m. on a Sunday, which causes any loud or unusual noise or sound disturbing the peace of residents of a residentially zoned neighborhood."

3.7-9 In response to Comment 4-9, the first sentence of third paragraph has been revised as follows:

"In general, all construction work for the project would be conducted between 8:00 a.m. and 8:00 p.m. on weekdays, between 9 a.m. and 7 p.m. on Saturdays, and between 10 a.m. and 7 p.m. on Sundays. In areas near residential zones (i.e., along Hetzler Road and near the Blair Hills community), the construction requirements and restrictions set forth in § 9.04.020 of the City's Municipal Code would be implemented by the Department. This could result in more restricted hours of construction in these areas."

3.7-9 In response to Comment 4-26, the following paragraph has been inserted after the first paragraph under Section 4.2.7:

"Based on the anticipated maximum square footage for the proposed visitor center, the project is expected to generate approximately 824 gallons per day (gpd). This is based on a generation rate of 80 gpd per 1,000 gross square feet for similar land uses (i.e., museum, library). The project would connect to an 8-inch diameter City sewer line on Wright Crest Drive that serves the Blair Hills area to the east of the project site. The 8-inch line connects to the 96-inch City of Los Angeles North Outfall Replacement Sewer (NORS), which travels roughly north-south through the project area. The newly completed 132-inch City of Los Angeles East Central Interceptor Sewer (ECIS) line travels underneath the Blair Hills area and Culver City Park, connecting to the NORS south-west of the project site. All these City of Los Angeles lines are gravity-fed and drain north to the Hyperion Treatment Plant in El Segundo. Given the substantial capacity of these lines and their relative capacity to accommodate a substantial increase, the proposed project would not result in an impact to the local sewage system. The Department would comply with the City's required utility connection fees."

4-2 The last sentence of the first paragraph has been revised to read:

"The proposed project would adhere to all applicable fire codes and guidelines; therefore, the project would not result in hazards related to wildland fire risk."

#### **Section 3.8 Geology and Soils**

#### Page Clarification/Revision

3.8-11 In response to Comment 9-4, the following mitigation measure has been added to Section 3.8.4, Mitigation Measures:

#### **Subsidence**

- GEO-3 The plans and specifications for the project shall be reviewed by a CEG to ensure that the soils conditions underlying the project site are suitable for development of the visitor center. This will include an evaluation of the potential for other organic material in the former landfill that may decompose and generate methane gas. Methane gas levels will be tested and subsidence levels will be estimated based on this information. If subsidence and/or methane gas levels are determined to require mitigation, measures shall be identified and incorporated into the project to reduce these impacts to acceptable levels. Such measures may include:
  - Excavation and recompaction of fill materials under the building foundation;
  - Building design modifications to avoid methane gas buildup and accumulation in the foundation and structure; and
  - Implementation of a methane gas monitoring program.

#### **Technical Appendices**

The traffic signal warrants included in the California Department of Transportation (Caltrans) *Traffic Manual, Chapter 3, Traffic Signals and Lighting,* have been added to Appendix D, Traffic and Parking Study. This information is provided at the end of this Final EIR.

In addition, the URBEMIS 2002 air quality emissions calculations have been added to the EIR as Appendix E. Appendix E is provided at the end of this Final EIR.

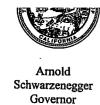
## CHAPTER 3.0 RESPONSE TO COMMENTS

The Draft EIR was distributed for public review on January 8, 2004, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines. During this public review period, a total of seven timely letters of comment were received. Five of the letters were from public agencies, and three were from private citizens. One late letter was received after the close of the review period from a public agency. All of the comment letters are listed in the following table and the corresponding Department responses are provided in this section. A copy of each comment letter is provided prior to each response.

Table 3-1. List of Comment Letters from Draft EIR

Letter No.	Agency/Organization/Individual	Date Received
1	Governor's Office of Planning and Research Signed: Terry Roberts, Director	February 24, 2004
2	Southern California Association of Governments Signed: Jeffrey M. Smith, AICP, Senior Regional Planner	January 27, 2004
3	South Coast Air Quality Management District Signed: Steve Smith, Ph.D., Program Supervisor	February 20, 2004
4	City of Culver City (Resolution No. 2004-R)  Approved by: Alan Corlin, Mayor, City of Culver City	February 16, 2004
5	City of Inglewood Signed by: Kevin L. Hawkins, Director	December 18, 2003
6	Citizen Letter 1 Signed: Stefan Freeman, Michele Carter-Freeman, and others	January 25, 2004
7	Citizen Letter 2 Signed: Pekke Rautionmaa, Stanford J. Searle Jr.	February 17, 2004
8	Citizen Letter 3 Signed: Jackie McCain	February 19, 2004
9	County of Los Angeles Department of Pubic Works ( <i>Late</i> ) Signed: James A. Noyes, Director of Public Works	March 1, 2004

3.0 Response to Comments	
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### Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Jan Boel Acting Deputy Director

February 24, 2004

Ron Saenz Department of Parks and Recreation 8885 Rio San Diego Drive, No. 270 San Diego, CA 92108

Subject: Baldwin Hills Scenic Overlook Project

SCH#: 2003111098

Dear Ron Saenz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 23, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely, Terry Roberts

Terry Roberts

Director, State Clearinghouse

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SCH# 2003111098

Project Title Baldwin Hills Scenic Overlook Project
Lead Agency Parks and Recreation, Department of

Type

EIR Draft EIR

Description

The proposed project has four primary elements: develop public access to the property; provide approximately 110 parking spaces for visitors; construct a 10,300-square-foot visitor center; and provide protection and interpretation of the natural and cultural resources of the park and the adjacent Ballona Creek. The project would restore the site's natural ridgelines and topography that were previously graded and would emphasize restoration of native coastal sage scrub habitat. The project area falls well below the nationally recommended standard of 6 to 10 acres of parkland per 1,000 people.

#### **Lead Agency Contact**

Name Ron Saenz

Agency Department of Parks and Recreation

Phone 619.6

619.688.3354

Fax

email

Address 8885 Rio San Diego Drive, No. 270

City San Diego

State CA Zip 92108

#### **Project Location**

County

Los Angeles

City

Region

**Cross Streets** 

Parcel No.

Township

Range

Section

Base

#### **Proximity to:**

Highways

**Airports** 

Railways

Waterways

Schools
Land Use

e Kenneth Hahn SRA, State Park designation (currently zoned residential in the City of Culver City

General Plan)

#### Project Issues

Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Geologic/Seismic; Growth Inducing; Landuse; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife

#### Reviewing Agencies

Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Department of Forestry and Fire Protection; Department of Water Resources; Office of Historic Preservation; Department of Parks and Recreation; Caltrans, District 7; California Highway Patrol; Regional Water Quality Control Board, Region 4; State Water Resources Control Board, Division of Water Quality; Native American Heritage Commission

Date Received

01/08/2004

Start of Review 01/08/2004

End of Review 02/23/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.

### Letter 1: Governor's Office of Planning and Research

Comment No. Response

1-1 The Governor's Office of Planning and Research acknowledges the Department's compliance with the requirements for draft environmental

documents, pursuant to CEQA.

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## ASSOCIATION of GOVERNMENTS

#### **Main Office**

818 West Seventh Street 12th Floor Los Angeles, California 90017-3435

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www.scag.ca.gov

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Orange County: Chris Norby, Orange County • Ronald Bales, Los Alamitos • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Bev Perry, Brea • Tod Ridgeway, Newport Beach

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Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

**Ventura County Transportation Commission:** Bill Davis, Simi Valley

January 27, 2004

Mr. Ron Saenz California Department of Parks and Recreation Southern Service Center 8885 Rio San Diego Drive, Suite 270 San Diego, CA 92108

RE: SCAG Clearinghouse No. I 20040030 Baldwin Hills Scenic Overlook Project

Dear Mr. Saenz:

Thank you for submitting the **Baldwin Hills Scenic Overlook Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Baldwin Hills Scenic Overlook Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. It is not necessary to send/provide us a copy of the Final EIR for this Project. However, please provide us with a Notice of Availability for the Final EIR. Please be sure that the Notice includes a complete project description and comment due date. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **January 1-15, 2004** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely

JEPFŘEY M. SMITH, AICP Senior Regional Planner Intergovernmental Review

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Letter 2: Southern California Association of Governments (SCAG)

Comment No. Response

2-1 SCAG determined that the proposed project is not regionally significant per

SCAG Intergovernmental Review (IGR) Criteria and CEQA Guidelines, and

thus has no comments.

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FAXED: FEBRUARY 20 2004

February 20, 2004

Mr. Ron Saenz California Department of Parks and Recreation Southern Service Center 8885 Rio San Diego Drive, No. 270 San Diego, CA 92108

Draft Environmental Impact Report (Draft EIR) for the proposed 58-acre Baldwin Hills Scenic Overlook site - California Department of Parks and Recreation

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Steve 5 mith

Sincerely,

Steve Smith, Ph.D.

Transfer the constant and breakly

Program Supervisor, CEQA Section

Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC040109-02 Control Number

## Adopt Draft Environmental Impact Report (Draft EIR) for the proposed 58-acre Baldwin Hills Scenic Overlook site - California Department of Parks and Recreation

- 1. In Table 3.6-3 on page 3.6-8 of the Draft EIR, the lead agency estimated short- and long-term emissions using the URBEMIS 2002 computer model. In the Final EIR and for subsequent analyses, the lead agency should include the model's output sheets as an appendix along with the assumptions and changes made to the model to estimate construction and operational emissions. This is especially important for this project given the fact that construction NO<sub>x</sub> emissions are so close to the applicable significance threshold.
- 2. The Estimated Construction Emissions' table on page 3.6-8 shows total construction estimates for the proposed project. In the Final EIR, it is recommended that construction estimates should be broken down by emission source for each relevant construction phase, i.e., any demolition, site preparation, and construction, showing emissions sources such as on- and off-road vehicle emissions, worker trips and architectural coating activities.
- 3. The discussion on page 3.6-9 states that construction activities will emit approximately 2,335 pounds of PM10, which would result in a maximum daily average of approximately 53.53 pounds of PM<sub>10</sub>. Since the URBEMIS 2002 output files were not included and construction emissions are not broken down by emissions source, it is unclear how a PM10 control efficiency of over 97 percent is achieved. In the Final EIR please demonstrate how such a high control efficiency is achieved. If the lead agency cannot document a control efficiency of 97 percent and PM10 emissions exceed the applicable significance threshold, the following mitigation measures are recommended, if feasible:
  - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
  - b. Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
  - c. Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- 4. Although the construction emission impacts for PM10 for the proposed project were estimated to be insignificant, the lead agency should consider revising some of the mitigation measures on page 3.6-10 and 3.6-11 to further reduce fugitive dust (PM10) and NO<sub>x</sub> impacts from the project, if feasible:

3-2

**3**\_3

3-4

## Draft Environmental Impact Report (Draft EIR) for the proposed 58-acre Baldwin Hills Scenic Overlook site - California Department of Parks and Recreation

#### Recommended Changes:

- AIR-3 All equipment shall be properly tuned and maintained <u>according to manufacturer's specifications</u>.
- AIR-5 Surface of dirt piles shall be stabilized if not removed immediately <u>using the following methods:</u> enclose, cover, water twice daily or apply non-toxic binders according to manufacturer's specifications.
- AIR-6 Paved streets shall be swept at least once per day with Rule 1186 compliant sweepers where there is evidence of dirt that has been carried onto the roadway or adjacent roadways.
- AIR-7 Replace ground cover in Ddisturbed areas that will not be paved as quickly as possible as part of the proposed project shall be revegetated to prevent soil erosion.
- AIR-8 For paved road track-out, all haul vehicles shall be covered or comply with vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.
- 5. On page 3.6-11, the lead agency discusses propose mitigation measures during high wind conditions but does not define what is meant by high wind conditions. The lead agency should specify what it means by high wind conditions in the Final EIR. If the lead agency means high winds of 25 mph or greater, then the SCAQMD recommends that the lead agency should cease all soil disturbance activities. For windy conditions less than 25 mph, the lead agency's proposed measures (AIR-10 through AIR-13) are sufficient.
- 6. Because NO<sub>x</sub> emissions during construction are so close to the applicable significance threshold, additional mitigation measures for consideration by the lead agency to ensure that NO<sub>x</sub> emissions do not exceed the applicable threshold, include the following:
  - a. Use electricity from power poles rather than temporary diesel power generators.
  - b. Prevent trucks from idling longer than 10 minutes.
  - c. Configure construction parking to minimize traffic interference.
  - d. Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
  - e. Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.

3-5

3-6

# Draft Environmental Impact Report (Draft EIR) for the proposed 58-acre Baldwin Hills Scenic Overlook site - California Department of Parks and Recreation

- f. Reroute construction trucks away from congested streets or sensitive receptor areas.
- g. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- h. Ensure that all heavy equipment are equipped with oxidation catalysts.

Letter 3:	South Coast Air Quality Management District
Comment No.	Response
3-1	The South Coast Air Quality Management District (SCAQMD) indicated that their comments are provided as guidance for the lead agency to incorporate into the Final EIR. As discussed below, SCAQMD's comments have been incorporated into the Final EIR.
3-2	The SCAQMD requested that the output sheets for the project's URBEMIS 2002 model should be included in the Final EIR. The output sheets were mistakenly excluded from the Draft EIR and have been included in Section 2.0 of the Final EIR as Appendix E.
3-3	The SCAQMD requested that construction emissions shown on Table 3.6-3 be broken down in greater detail in the EIR. Table 3.6-3 of the Draft EIR has been revised and the requested information is provided in Section 2.0 of the Final EIR.
3-4	The SCAQMD requested backup for air quality calculations and provided mitigation measures to further reduce impacts related to $PM_{10}$ during construction. The discussion on page 3.6-9 of the Draft EIR states that construction activities would emit approximately 2,335 pounds of $PM_{10}$ and that the maximum daily average would be approximately 53.53 pounds of $PM_{10}$ . The approximately 2,335 pounds of $PM_{10}$ is the amount that would be emitted over the life of the project. Thus, the mitigation measures are not reducing $PM_{10}$ emissions from 2,335 to 53.53 pounds per day.
	As discussed above, the URBEMIS 2002 output sheets are provided in Section 2.0 of the Final EIR and Table 3.6-3 has been revised to show the requested information. In addition, the recommended air quality mitigation measures have been incorporated into the Final EIR as measures AIR-18, AIR-19, and AIR-20.
3-5	The SCAQMD has recommended amending several of the mitigation measures in the Draft EIR to further reduce $PM_{10}$ emissions. These revisions have been made and have been incorporated into the Final EIR.
3-6	The SCAQMD recommends that the EIR define what is meant by high wind conditions. High wind conditions are defined as windy conditions less than 25 miles per hour. This clarification has been made in Section 2.0 of the Final EIR. In addition, a mitigation measure (AIR-25) was added to cease all soil disturbance activities in high winds of 25 miles per hour or greater. This revision is also reflected in Section 2.0 of the Final EIR.
3-7	The SCAQMD has recommended several mitigation measures to ensure that NOx emissions do not exceed the applicable threshold. These mitigation measures have been incorporated into the Final EIR and are included in Section 2.0.

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#### **ADMINISTRATIVE OFFICE**



### CITY OF CULVER CITY

(310) 253-6000 • FAX (310) 253-6010

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

February 23, 2004

Mr. Ron Saenz
California Department of Parks and Recreation
Southern Service Centers
8885 Rio San Diego, No. 270
San Diego, CA 92108

[Certified with Return Receipt]

Re: City of Culver City Comments on the Draft Environmental Impact Report for the Baldwin Hills Scenic Overlook

Dear Mr. Saenz:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the Baldwin Hills Scenic Overlook (Scenic Overlook). This letter transmits the City of Culver City's (the City) official comments on the Scenic Overlook Draft EIR which are provided in Resolution No. 2004-R012, including Exhibit A, that the City Council approved on Monday, February 16, 2004. In addition I have also included letters and other correspondence that the City received from local residents and resident organizations.

The City appreciates the time and effort that the Department of Parks and Recreation (DPR) spent preparing the Draft EIR and responding to our previous comments on the Notice of Preparation (NOP) of an EIR, dated December 11, 2003. However, a number of issues identified in our comments on the NOP remain either unaddressed or inadequately addressed in the Draft EIR. Among other issues, the Draft EIR did not sufficiently address the following:

- Use and alteration of Hetzler Road;
- Impacts to emergency and utility service providers; and,
- Impacts to residents of Blair Hills, Hetzler Road and Tompkins Way.

Detailed comments on these and other topics are provided in Exhibit A of the attached resolution. The City requests that the DPR provide comprehensive responses to these issues and ample mitigation measures prior to the completion of the Final EIR. The City would like to be notified of the time and location of the public hearing at which the Final EIR will be certified as soon as possible.

In addition to the formal comments submitted by the City, staff would like to meet with DPR representatives to find mutually acceptable ways to resolve the numerous outstanding issues. I, or a member of my staff, will contact you shortly to begin these discussions.

Scenic Overlook DEIR Page 2 of 2 February 19, 2004

The City of Culver City looks forward to working together with the DPR to accomplish our mutual goal of improving community services. Should you have any questions, please contact Mark Wardlaw, Deputy Community Development Director/Planning Manager at (310) 253-5706.

Sincerely,

**Deborah Fancett** 

Assistant Chief Administrative Officer

#### Attachments:

1. City Council Resolution No. 2004-R012, including Exhibit A

2. Culver City Comments on the Notice of Preparation of a Draft Environmental Impact, dated December 11, 2003

3. Correspondence from Culver City Residents and Resident Organizations

C: Members of the City Council
Jerry Fulwood, Chief Administrative Officer
Carol Schwab, City Attorney
Gary Martin, Acting Police Chief
Jeff Eastman, Acting Fire Chief
Pam Keyes, Public Works Director
Don Rogers, Parks, Recreation, and Community Services Director
Steve Cunningham, Transportation Director
Susan Evans, Community Development Director
Mark Wardlaw, Deputy Community Development Director

4-1

#### RESOLUTION NO. 2004-R

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, TRANSMITTING THE OFFICIAL CITY OF CULVER CITY RESPONSE TO THE 2004 DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BALDWIN HILLS SCENIC OVERLOOK PROJECT.

WHEREAS, the 58-acre State-owned Baldwin Hills Scenic Overlook (Proposed Project) project site is part of the 387-acre Kenneth Hahn State Recreation Area (KHSRA) which consists of approximately 319 acres of the public parkland located east of La Cienega Boulevard; and,

WHEREAS, the Proposed Project site is within the boundaries of the City of Culver City, and the impacts of its operation and other areas of KHSRA, including the larger Baldwin Hills area, are of critical interest to the Culver City community; and,

WHEREAS, on June 12, 2002, the California State Department of Parks and Recreation (DPR) published the June 2002 KHSRA General Plan Amendment (the "June General Plan"), and Draft Environmental Impact Report (Draft EIR) to serve as a guide for future natural open space and parkland improvements, facility development and habitat restoration, and for connection to trails, parks and other public facilities in KHSRA; and,

WHEREAS, on August 19, 2002, the Culver City City Council considered the June General Plan and Draft EIR at a public meeting, accepted public comments, and adopted Resolution 2002-R087 in support of the proposed expansion of KHSRA to

include the use of the Proposed Project site for public parkland use provided all negative project impacts are adequately mitigated and analyzed; and,

WHEREAS, on January 8, 2004, the DPR published a Draft Environmental Impact Report (2004 Draft EIR) for public review to address the potential environmental impacts caused by the Proposed Project; and,

WHEREAS, the 2004 Draft EIR includes three project alternatives: 1) No Project;
2) Multiple Access Roads Alternative, and 3) Hillside Visitor Center Alternative; and,

WHEREAS, the City Council of the City of Culver City, accepted public comments and considered the 2004 Draft EIR at a public meeting on February 16, 2004.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

The following key findings are hereby made by the City Council of the City of Culver City. These findings are described more fully and augmented in greater detail in "Exhibit A", which is attached to and incorporated into this Resolution.

 The City of Culver City does not support the use of Hetzler Road as the main access to the Proposed Project but does support the construction of a new roadway that would provide separate access to the Proposed Project.

2. The City of Culver City requests that the DPR make all reasonable efforts to comply with City requirements that have to do with roadway improvements, water service supply and connections, nuisance prevention, fire prevention measures and the provision of police, fire and other emergency services.

Pursuant to the foregoing recitation and findings, the City Council of the City of Culver City, California, hereby: 4-1

- Establishes that this Resolution, including attached Exhibit "A," constitutes the City of Culver City's formal position and comments on the 2004 Draft EIR.
- Directs and authorizes Staff to transmit the position and comments of the City of Culver City on the Draft EIR to California State Department of Parks Recreation Parks Department.

APPROVED and ADOPTED this 16th day of February 2004.

ALAN CORLIN, Mayor
City of Culver City, California

ATTEST:

APPROVED AS TO FORM:

CHRISTOPHER ARMENTA
City Clerk

CAROL A. SCHWAB
City Attorney

# **EXHIBIT A**

# 1.0 INTRODUCTION

1.6 Project Approvals, Page 1-7

Although the California Department of Parks and Recreation (DPR), as a State agency, does not need to comply with local land use requirements, because the DPR will depend on City of Culver City (City) emergency services, the City requests that the DPR make all reasonable efforts to comply with City requirements that have to do with roadway improvements, water service supply and connections and fire prevention measures. The City's fire requirements are intended to improve public safety, lessen risk of fire damage and to enable emergency service personnel to provide consistent and reliable service.

# **2.0 PROJECT DESCRIPTION**

2.4. Project Characteristics

- a. On page 2-6, the 2004 Draft EIR identifies Hetzler Road as the main access route to the Proposed Project. City staff does not support the use of Hetzler Road as the main access route for the following reasons:
  - i. Hetzler Road is a private road that provides the only access to homes on Hetzler Road and Tompkins Way.
  - ii. Hetzler Road is not currently designed to withstand the amount of traffic and traffic speeds that the Proposed Project is likely to generate.
  - iii. Use of Hetzler Road by Scenic Overlook patrons will negatively impact the safety and quality of life of Hetzler Road and Tompkins Way residents.
  - iv. The DPR has not submitted sufficient evidence that it has the right to significantly alter the character and use of the private road over which Hetzler Road and Tompkins Way residents have an access easement.
- b. The alternative access and circulation scheme identified in Multiple Access Roads (Alternative 2) on page 5-2 is preferable to the access and circulation scheme of the Proposed Project as identified on page 2-6.
  - i. Alternative 2 is preferable because it includes the construction of a new roadway that would bifurcate into two separate roads part way up the hill. This bifurcation would provide a significant benefit to the community, reduce neighborhood traffic and safety concerns and protect the quality of life of existing residents without compromising public access to the Proposed Project.

4-2

4-3

ii. If Alternative 2 is implemented the DPR should provide traffic controls at the new intersection, create a "T" intersection that is as close to a 90 degree angle as possible, and make sure that the bifurcation is at least 100 feet from the Jefferson Boulevard connection

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- c. Should the DPR decide to use the Hetzler Road to access the Scenic Overlook, then the DPR should, at a minimum:
  - i. Design the road to a width and strength that can safely accommodate fire department apparatus, which may require the installation of turnouts to provide adequate turn around area for fire trucks.
  - ii. Widen the roadway to provide space for a bike an ADA-compliant pedestrian path.
  - iii. Widen the roadway to allow vehicles backing out of driveways to have an adequate line of sight to oncoming traffic. Install a separate road for the residents to minimize the turn/merge conflicts. Mirrors are not approved by the Manual on Uniform Traffic Control Devices (MUTCD) and should not be used.
  - iv. Include low voltage safety lighting for pedestrians, cyclists and vehicles.
  - v. Provide Culver City with the opportunity to review and comment on the final design of Hetzler Road. The Fire Department's comments are critical for proper design of this roadway.
- d. On page 2-6, the 2004 Draft EIR states that pedestrian trail links to Culver City Park are proposed. The proposed trail links will likely bring additional hikers and walkers through Culver City Park. Impacts include additional wear and tear and trash on pedestrian paths, including the Nature Trail. Additionally, users of the Proposed Project may also use Culver City Park facilities, including the picnic shelter and restrooms. Existing facilities, particularly the restroom and children's playground area would not be sufficient to accommodate an increased number of park users. Mitigation measures should include funding for Culver City Parks, Recreation and Community Services capital improvements as additional impacts arise from the development of the Proposed Project.
- e. Because the parking lots at Culver City Park are free and because there is no charge for street parking, it is highly likely that users of the Proposed Project will choose to park in Culver City Park. Indicate how DPR will adequately mitigate this issue.
- f. On page 2-6, the 2004 Draft EIR indicates that pedestrian trails will connect the Proposed Project to the Blair Hills neighborhood to the east. The 2004 Draft EIR does not indicate how potential parking intrusion in the Blair Hills neighborhood will be mitigated. It is likely that patrons of the

4-9

Proposed Project will attempt to park in the Blair Hills neighborhood, particularly if the DPR charges for parking.

- g. On page 2-8, the 2004 Draft EIR indicates that special events will occur at the visitor center/nourishment area under certain conditions. With regard to the operations of special events, the DPR should:
  - i. Indicate whether special events at the visitor center will be operated by DPR staff or by a concessionaire.
  - ii. Indicate how traffic will be monitored and if measures will be taken to close park access to vehicles when the parking lots are full.

iii. Indicate how the DPR will ensure that special event guests do not park in adjacent residential neighborhoods

iv. Indicate how often special events will be scheduled. Indicate whether special events can occur during the week or only during weekends. Indicate whether special events occurring after 10:00 p.m. will be limited to specific days of the week or to a specific number of events per month.

# 2.5 Construction Scenario

a. The proposed construction hours do not respect Culver City Municipal Code § 9.04.020 Nuisances Declared and Prohibited, which states that the use or operation of any automobile, motorcycle, engine, machine, or mechanical device, or other contrivance or facility, or the carrying on of any trade or business, causing between the hours of 7:00 p.m. and 8:00 a.m., any loud or unusual noise or sound, disturbing the peace of residents of a residentially zoned neighborhood is prohibited. The same section of the CCMC also states that the use of any of the foregoing in construction or excavation work between the hours of 7:00 p.m. and 8:00 a.m., on a weekday, or between the hours of 7:00 p.m. and 9:00 a.m. on a Saturday, or between the hours of 7:00 p.m. and 10:00 a.m. on a Sunday, which causes any loud or unusual noise or sound disturbing the peace of residents of a residentially zoned neighborhood is also prohibited.

b. The 2004 Draft EIR states that parks and outdoor recreation areas are sensitive receptors for noise. According to the report, "Noise from construction activities, assuming the loudest activity and the loudest equipment, as presented (in the report) would affect sensitive receptors in the project vicinity..." Construction noise impacts to park users should be better addressed.

c. The City requests that the DPR respect Culver City Municipal Code § 9.04.020 Nuisances Declared and Prohibited, and help preserve the quality of life of the adjacent residential neighborhoods and park users.

4-12

4-11

Culver City Comments on Baldwin Hills Scenic Overlook 2004 DRAFT EIR Page 4 of 6 February 16, 2003	1
d. Any work done on the perimeter of the property that may impact adjacent residential or City property shall be coordinated with those entities and provide for neutral impact.	4-13
e. Maintain the cleanliness of Hetzler Road during construction with daily sweeping and cleaning.	4-14
3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION	
3.2 Aesthetics, Light and Glare Include low voltage safety lighting for pedestrians, cyclists and vehicles that does not negatively impact adjacent residences.	4-15
<ul> <li>3.5 Transportation and Circulation Impacts</li> <li>a. A traffic signal at Jefferson/Hetzler should be considered, since eastbound Jefferson traffic is not visible as it approaches Hetzler Road due to the curving nature of the Jefferson Boulevard.</li> </ul>	4-16
b. On page 3.5-5, the 2004 DRAFT EIR states that Culver CityBus provides three local transit routes in the "immediate vicinity" of the project site. It further reads, "The three Culver CityBus transit routes provide headways of one to three buses per hour during the weekday afternoon peak hour." In fact, Culver CityBus' line 3, the only of the three bus lines mentioned that provides 20 minute headways (and evening and weekend service), runs north-south on Overland Avenue, which cannot be considered immediately proximate to the Proposed Project site area. The MTA line 220, which runs on Culver Boulevard at a frequency of once an hour, is also considered to fall in the project vicinity. If one-quarter mile is generally the distance quoted by planners to be the maximum distance	4-17

c. On page 3.5-14, the 2004 Draft EIR states that the Route 90 and 405 Freeways are the principal routes in the vicinity of the project area. However, the 2004 DRAFT EIR does not mention Route 10 and on/off ramps at La Cienega, Robertson, and National and their contributions for motorists attempting to access the park. This fact leads to skepticism about the validity of the report's traffic study/model.

4-18

people will walk to or from transit, the site location cannot be considered

3.7 **Noise** 

a. See comments under section 2.5 for construction noise concerns.

proximate to twenty-minute headway transit service.

b. On page 3.7-11, the 2004 Draft EIR states that property owners and residents with a 500-foot radius of the Proposed Project site will be notified of any special events occurring after 10:00 p.m. In addition to

notifying adjacent residents about special events occurring after 10:00 p.m., indicate what recourse adjacent residents can take if special events attendees constitute a noise disturbance. Indicate which agency will be responsible for patrolling the area and which agency will respond to noise complaints at the Proposed Project. Indicate if noise disturbances are continual, if the hours of operation can be modified, and if so, indicate the modification procedure.

4-20

# 3.9 Public Services

a. On page 3.9-1, the 2004 Draft EIR states that the Culver City Fire Department will provide fire and emergency service to the Proposed Project. The 2004 Draft EIR does not adequately address the anticipated increase in calls for service, increase in response time and increase in personnel demands.

4-21

b. On page 3.9-1, the 2004 Draft EIR states that water service, including fire service, will be extended from the adjoining Blair Hills water system. Since the project site is at a much higher elevation than the Blair Hills residential area, there may not be adequate pressure to serve the Proposed Project. Servicing the Proposed Project may require the construction of new facilities (pump stations or water tanks) to provide adequate fire protection. A fire flow requirement of a minimum 2000 gallons per minute from two to three adjacent fire hydrants is required.

4-22

c. Fire hydrants should be provided along the access road and spaces no farther than 300 feet apart, along streets that are less than 80 feet wide and do not have center medians. A full fire sprinkler system should be installed in all new buildings. Roof covering for all new structures should have a Class A rating.

4-23

d. The Culver City Fire Department should be allowed to review and approve final plans for the construction of any fire and/or water system.

4-24

e. On page 3.9-2, the 2004 Draft EIR states that the Culver City Police Department, in conjunction with the DPR Rangers, will provide law and traffic enforcement services in the area. The 2004 Draft EIR does not adequately discuss the anticipated increase in calls for service and the associated increase in response time for police services. These increases will be caused by the increase in traffic surrounding the Proposed Project and the lack of additional personnel that will be necessary to handle these increases.

4-25

f. The 2004 Draft EIR states that sewer lines will be installed to accommodate the sewerage of the proposed project. The connection of this new sewer line appears to be at the upper end of Wright Crest Drive.

Culver City Comments on Baldwin Hills Scenic Overlook 2004 DRAFT EIR Page 6 of 6 February 16, 2003

A sewer area study should be performed to insure that the increased sewer load will not impact Culver City's sewer system. This study should be reviewed and approved by Culver City.

4-26

# 4.2 Hydrology and Water Quality

Construction of the project will create graded slopes and additional impervious areas such as the parking lots and a wider access road. A thorough drainage study should be prepared to analyze the potential for increased storm runoff. This study should be reviewed by Culver City to insure that appropriate mitigation measures are instituted to prevent any impacts to the adjoining public right-of-way. All necessary requirements of the State's NPDES Permit shall be addressed in the Drainage and Grading plans.

# RECEIVED

February 19, 2004

**Culver City** Planning Division

To:

Alexandra Howard

Planning Department

Culver City, Ca.

From:

Mary Ann Greene

**Blair Hills** 

Subject: EIR for Baldwin Hills Scenic Overlook

The proposed project is a massive undertaking, which will provide improved passive recreational opportunities for residents of Culver City and the Westside. Residents of Blair Hills support the plan. However, there are some concerns which we have, and which I will try to address.

I Traffic and Hetzler Road

> Presently, those enjoying the hilltop are hikers from the neighborhood (many of whom hike to the top at least once/week), and other Westside hikers. For years, this hilltop was used by Westside hikers and Westside regional hiking clubs and running clubs. They still constitute the majority of the people who use the hilltop. Over time, others may come from other areas, but presently, its use is pretty much as described. Therefore, I think that monitoring of the intersections and traffic flows west of La Cienega make the most sense.

4-28

The proposal to make Jefferson Blvd. curbs in the area red-painted for no parking is ill informed. Presently, users of the Overlook park on Jefferson, in front of the hiking trail entrance, and bypass Hetzler Road, altogether. This should be encouraged. As long as hikers are using Jefferson Blvd. to park, they will not interfere with nor disturb Hetzler Road residents. We do not think Hetzler Road is a good entrance for the park. The State should negotiate with Culver City for another

entrance that does not immediately affect residents.

Parking lots created for 100 cars take up a lot of the space. Although the report speaks of using only 15 acres of the 58 acres, that is still a large area. It is large enough to sit one of LA County's juvenile halls, which has 10 buildings, inside it. Blair Hills residents fought to keep this land pristine, and not be paved over in support of cars that will contribute to continued and increased air pollution. Both at the community meetings and at the Conservancy, there were pleas from residents to consider shuttle service at regulated times. Negotiating with the small businesses along Jefferson for use of their parking lots on weekends, when they are not opened, could create such service. Also, purchase of a hybrid 9 or so passenger van (Perhaps GM would even give us one) would solve the problem of transportation. This plan is far more cost effective than putting thousands of dollars into widening Hetzler, and thereby interfering greatly with those

residents' lives. Having a shuttle service is the only way we could support the use of Hetzler Road as an entrance. Unfortunately, State Parks staff rejected this proposal for the very reason it should have been given weight: getting people out of their cars. There would be absolutely no negative impact on the neighborhood, because the area immediately surrounding the park on its northside is all light manufacturing, and not in use on weekends. State Parks should be in the business of supporting the environment, and all its particulars. This includes finding ways to minimize increased air pollution. Cars are the number one polluters. Why, then, should Parks support this air pollution by increasing the number of parking spaces on the hilltop?

4-33

Alternative 2, which includes a separate road for residents and/or a gate to make the road private for residents, should be given strong consideration, in the event that the State does not approve off-site parking.

4\_3/

`This alternative also recognizes the easements the owners on Hetzler and Tomkins Way have, which gives them the right to call that a private road.

#### II. Water Service

We have some concern about State Parks' use of existing service that is designed for Blair Hills. We wonder what impact this increased service would have on usage further down the hill? Would this additional usage mean limited water supplies at certain times of the year for Blair Hills residents? The tanks seem small to accommodate the hilltop, too. We think that State Parks should create another water tank for usage at the hilltop.

4-35

#### III. Subsidence

We must take issue with your findings. Ground subsidence measurements have not been taken since 1976, almost 30 years ago. No subsidence has been noticed on the hilltop, because there was nothing on the hilltop, and no reason for anyone to look. However, in 1996 when Blair Hills investigated that issue with a geologist expert in this field, his conclusion was that subsidence is still occurring and possibly at an increased rate. During this 30 year period, the oil companies leasing this land, began reinjecting water into the fields, to increase production. This water helped to destabilize the hillside. There is a Public Resources law that requires the State to monitor this subsidence. But this law has not been in effect for some time. Before such building begins, we would ask that the subsidence level be measured and the rate calculated. You can ask almost any resident of Blair Hills whether there is subsidence, and the answer will be "yes". Periodically, over years, windows and doors have to be replaced, or floors leveled because of this phenomenon, we believe. Blair Hills objected to the development of homes on this hillside for just that reason. Subsidence and other geological factors would have caused significant damage, over time, to the homes. We believe the same thing will happen to this huge structure the State wishes to put on the

4-36

hillside. This investigation should have also included materials developed by Blair Hills attorneys on the devleopment, not just the findings of the developers..

#### IV Structure

At no time during public meetings, was there serious discussion about the size of the building. 10,000+ square feet seems like a very large structure for the use for which it is designed. We think it should be smaller, and that more land should be made available for picnicking and hiking. As mentioned before, 15.1 acres is large enough to sit a juvenile hall inside its boundaries.

4-37

### V. Emergency services

We urge State Parks to complete the mutual aid pact with Culver City Police Department, so that residents can know the issue of first response has been settled. As it stands now, we are not serviced adequately by either the Culver City police or park rangers. Once this mutual aid pact is signed, residents will at least know who is accountable and who to call for help.

4-38

We urge State Parks to again meet with residents on the particulars. State Parks Superintendents have consistently said the State tries to be a good neighbor. We believe that is so, as State Parks' actions have proven several times in the past. But this project is at the heart of the reason for Blair Hills' fight over land use. It is therefore very important to us that the use be consistent with an environmentally sound project, that the land be kept as pristine as possible, and not overbuilt, nor paved over.

#### Letter 4:

# **City of Culver City**

### Comment No.

#### Response

4-1

The City has transmitted Resolution No. 2004-R0\_\_, including Exhibit A. The Department has responded to the detailed comments provided in Exhibit A in the following responses 4-2 through 4-27.

4-2

The City acknowledged that the Department does not need to comply with local land use requirements and requested that the Department make all reasonable efforts to comply with City of Culver City requirements related to roadway improvements, water service supply and connections, and fire prevention measures. The Department is committed complying with the City's requirements where feasible. For example, as stated in Section 3.7.3 of the Draft EIR, construction activities would not be conducted outside the hours allowed by the City of Culver City noise ordinance unless an extended hours permit is obtained from the City. Roadway improvements, water service, and fire prevention measures are discussed in greater detail below.

4-3

The City indicated that they do not support the use of Hetzler Road as the main park access route. The proposed project is the result of numerous public meetings and several months of outreach efforts undertaken by the Department to identify a consensus plan for the scenic overlook site. Through this process, a preferred plan was developed which utilizes Hetzler Road as the main access route to the proposed scenic overlook facilities. One of the alternatives analyzed in the EIR would provide a separate access road to the site, which would provide a private access to the residences on Hetzler Road. The City's support of the Multiple Access Roads Alternative will be provided to the Department for consideration in the decision-making process.

A number of features have been incorporated into the design of the project that would minimize the potential for traffic safety impacts on Hetzler Road. Specifically, the Hetzler Road entrance would be improved and restriped to accommodate the relatively low peak hour traffic volumes (estimated at just over one vehicle per minute at full utilization of the proposed buildings/structures). Parking would be prohibited along both sides of Hetzler Road between Jefferson Boulevard and the top of the hill. In addition, warning signs would be installed along Hetzler Road indicating any roadway curvatures as well as residential driveways. As described in Section 2.4.1 of the Draft EIR, convex mirrors would be installed at residential driveways to provide adequate visibility for vehicles approaching and exiting the driveways.

The City indicated that the Department has not submitted evidence that it has the right to significantly alter the character and use of Hetzler Road. The Department has legal access to Hetzler Road, as do the residents of Hetzler Road and Tompkins Way. The proposed roadway improvements would occur on Department property.

4-4

The City stated their support of the Multiple Access Roads Alternative and indicated that additional traffic controls would be necessary at the park entrance on Jefferson Road if the proposed project is implemented. The intersection of Jefferson Boulevard and Hetzler Road was considered for a traffic signal installation as it is currently stop-sign controlled (i.e., the Hetzler Road approach to Jefferson Boulevard is controlled via a stop sign). Traffic signal warrants included in the California Department of Transportation (Caltrans) Traffic Manual were utilized to determine if a traffic signal installation is warranted at the Hetzler Road location based upon future conditions. It is important to note that in addition to Caltrans warrants, field observations indicated no left-turn vehicle queuing occurred either on Hetzler Road or on Jefferson Boulevard. An existing two-way leftturn lane is provided along Jefferson Boulevard. Based on the existing and forecast future traffic volumes at the Hetzler Road location, it was determined that Caltrans Warrant No. 11. Peak Hour Volume, is not satisfied since the traffic volumes on the minor approach (Hetzler Road) do not meet the minimum requirements. A copy of the traffic signal warrant data worksheets for this location are included in the Final EIR. As the traffic signal warrants were not met at the Hetzler Road intersection under the proposed project, it is reasonable to conclude that the traffic signal warrant would also not be met under the Alternative 2 access location (located further east of Hetzler Road).

As stated on page 3.5-17 of the Draft EIR, along the project frontage on Jefferson Boulevard, both east and west of Hetzler Road, adequate sight distance would be necessary to ensure adequate traffic safety at the intersection. Mitigation was provided in the EIR and is intended to reduce potential impacts to a less than significant level.

4-5

The City recommended several measures to be implemented along Hetzler Road if the proposed project is carried forward. As recommended, the roadway would be constructed to provide adequate clearance for emergency vehicles. Also, the road would be widened in the vicinity of the residences to provide safe access to and from the residences located along the road. Mitigation has been provided in Section 2.0, Clarifications and Modifications, of the Final EIR to ensure that no parking would occur on Hetzler Road. The current design of the project does not include a pedestrian path or low voltage lighting along Hetzler Road as suggested; however, this recommendation will be considered by the Department in the decision-making process and the proposed new features will be considered by the Department in the final design of the project.

The Department will consider the City Fire Department requirements during the final design phase of the Hetzler Road improvements to ensure that adequate emergency vehicle access is provided.

4-6

The City commented on the potential impacts that could result from increased use of the neighboring City parks. The City recommended that the Department should provide funding to the City to mitigate these potential impacts. As discussed in Section 4.6.6 of the Draft EIR, construction and operation of the Scenic Overlook project would not significantly impact any

nearby parks or natural areas. Some hikers may pass through Culver City Park to avoid construction activities; however, this would not result in any physical deterioration of any surrounding park facilities and no significant change in use patterns would be expected to occur. The Scenic Overlook site would include restrooms, drinking fountains, and other amenities for park users and the number of visitors that would utilize the neighboring facilities at Culver City Park or Blair Hills Park would not be significant. Accordingly, no mitigation would be required.

4-7

The City commented on the potential parking impacts at Culver City Park. The parking lots at the Scenic Overlook would accommodate the anticipated number of park users and spill over impacts would be minimal. Appendix D of the Draft EIR contains a summary of the peak daytime parking demand analysis and after hours/off-peak parking demand analysis. As described on page 3.5-16 of the Draft EIR, a peak daytime parking demand of 73 spaces is forecast for the proposed project. This forecast includes peak administration (i.e., rangers, office staff, etc.) staff demand, visitor demand for the administrative office, usage of visitor/exhibit area, and usage of the picnic and trails system. Also, the forecast assumes that the nourishment area is not being leased or rented out during typical park hours of operation. projected peak after hours/off-peak parking demand of 87 spaces is forecast for the proposed project. This forecast includes demand for after hours/offpeak leasing or renting out of the nourishment facility. Additionally, to provide a conservative worst-case analysis, the forecast includes demand associated with visitor usage of the picnic areas and trail system.

Approximately 110 on-site parking spaces are planned for the proposed project. Thus, the proposed supply (110 spaces) is expected to more than adequately satisfy parking demand (up to 87 spaces during special events) for the project. Currently, park entrance fees are not anticipated and visitors to the Scenic Overlook would not benefit from parking off-site. If an entrance fee is required, it would be nominal and would not significantly affect regular visitor parking. As such, the proposed project would not result in substantial physical deterioration of any facilities at the nearby City park and would not affect the provision of recreational services in the area. The proposed project would be beneficial to the residents of Culver City, the community of Baldwin Hills, and other surrounding parkland deficient areas.

4-8

The City commented on the potential impacts to parking in the Blair Hills community from trail connections resulting from the project. The project would not include a new trail into the Blair Hills community; rather, the trail would connect to western end of Bowcroft Street, which is located in an industrial area to the north of the residential community. A trail connection currently exists at the end of Bowcroft Street. Section 2.4.1 of the Draft EIR has been revised to clarify that the trails will not connect directly to the Blair Hills community. Please see response to comment 4-7 regarding parking at the Scenic Overlook.

4-9

The City requested additional information regarding the operation of special events at the proposed nourishment area. Section 2.4.3 of the Draft EIR provides information regarding special event operations at the park. The

traffic and parking study (Appendix D) of the Draft EIR projected a peak parking demand of 87 spaces during special events. Therefore, it is anticipated that the 110 parking spaces in the park would accommodate all park users. The city's comments have been provided to the Department for review and consideration in the decision-making process.

4-10

The City indicated that the proposed construction hours do not respect Culver City Municipal Code § 9.04.020 Nuisances Declared and Prohibited. The hours of construction identified in the Draft EIR are consistent with the City's noise regulations identified in Culver City Municipal Code § 9.07.035; however, the EIR did not include the noise restrictions provided in § 9.04.020. The Draft EIR has been revised to include the City's Municipal Code requirements for construction activities near residential zones. As discussed above, construction activities would not be conducted outside the hours allowed by the City of Culver City noise ordinance unless an extended hours permit is obtained from the City. Impacts from construction noise would be less than significant after mitigation.

4-11

The City commented on need for more detail in the noise impact analysis in Section 3.7.3 of the Draft EIR. As discussed in the Draft EIR, noise impacts associated with the project construction activities would be concentrated in the area of the proposed visitor center where no sensitive receptors are present. Construction activities along Hetzler Road would result in temporary noise impacts at levels that are typically associated with roadway improvements. Noise levels may intermittently exceed 75 dBA during some construction activities; however, impacts would be temporary and would be less than significant upon implementation of the mitigation measures provided in Section 3.7.4 and compliance with the City's nose ordinance.

4-12

The City requested that the Department adhere to the requirements included in the Culver City Municipal Code § 9.04.020 Nuisances Declared and Prohibited. Please see response 4-9 above. As discussed, construction activities would not be conducted outside the hours allowed by the City of Culver City noise ordinance unless an extended hours permit is obtained from the City.

4-13

The City requested that the Department coordinate with surrounding land owners during construction to minimize impacts. The most effective and appropriate combination of resource avoidance and monitoring will be employed by the Department during all phases of project construction. Although not required to comply with local land use requirements, the Department comply with the hours defined in the City's Noise Ordinance during construction.

4-14

The City requested that the Department maintain the cleanliness of Hetzler Road during construction with daily street sweeping and cleaning. Mitigation Measure AIR-6 provided in the Draft EIR would require the sweeping of paved streets at least once per day where there is evidence of dirt that has been carried onto the roadway.

4-15

The City requested the addition of low voltage lights for pedestrians, cyclists, and vehicles that do not negatively impact adjacent residences. The visitor center and upper parking lot would include limited safety and security lighting and the document includes a mitigation measure to minimize any potential impacts associated with light pollution from the project site. The plans do not include any lighting along Hetzler Road. The City's request for additional lighting will be provided to the Department for consideration in the decision-making process.

4-16

The City requested a traffic signal at the intersection of Jefferson Boulevard and Hetzler Road. Please see response to 4-4.

4-17

The City questioned the accuracy of information in the Draft EIR pertaining to the location of bus routes in relation to the project site. As a point of clarification, the transit routes identified in the Draft EIR were considered in the vicinity of the project site. This is because Culver CityBus Line 3, MTA Route 220, and LADOT Commuter Express Route 437 directly intersect with Culver CityBus Line 4, which runs on Jefferson Boulevard adjacent to the project site. These transit lines would provide direct service to the project site with a corresponding transfer.

The commentor's note that the Culver CityBus Line headway is one bus per hour is consistent with the headway identified in the Draft EIR. The commentor is correct in stating that the transit headway to be considered in the immediate vicinity is therefore one bus per hour. It is important to note that the transit availability is noted in the Draft EIR for informational purposes only. The traffic analysis does not consider reductions in either parking requirements or trip generation due to existing transit availability. Therefore, the Draft EIR traffic analysis can be considered conservative and no changes or modifications to the analysis are required.

4-18

The City indicated that the Draft EIR does not adequately analyze impacts to on/off ramps on Interstate 10 (I-10) at La Cienega Boulevard, Robertson Boulevard, and National Boulevard. The commentor has correctly restated the text on page 3.5-14 of the Draft EIR, which indicates that principal freeway routes in the vicinity of the Project include the I-405 (San Diego Freeway) and the State Route (90) Freeway; however, the statement is not intended to infer that no project vehicle trip generation would be attributable to the I-10 and referenced ramps. In consultation with City of Culver City staff and City of Los Angeles Department of Transportation staff, the study area was defined to include those intersections north of the project site that would capture those vehicle trips originating from the I-10. Since access to the project site is proposed only from Jefferson Boulevard, intersections along the eastern border of the project site (e.g., from La Cienega Boulevard) were not required for analysis.

As concluded in the Draft EIR traffic analysis that the project and project alternatives are not expected to create a significant impact at any of the seven study intersections, expansion of the study area to include additional locations is not required.

- 4-19 The City referenced earlier comments regarding noise concerns. Please see responses 4-10 and 4-11.
- The City requested clarification about the enforcement agency for noise complaints and indicated that operational changes should be allowed if noise disturbances occur too frequently. The primary enforcement agency for noise complaints would continue to be the City of Culver City Police Department; however, the park rangers would also be available to respond to such complaints. Although not anticipated, if operational noise impacts were to occur on a regular basis, the Department would consider revisions to the operational procedures for the park site.
- 4-21 The City indicated that the Draft EIR analysis does not adequately analyze impacts associated with increased calls for fire service resulting from the project. The City of Culver City Fire Department was contacted on November 26, 2003 regarding the proposed project. Fire Department personnel indicated that the project would not result in significant impacts related to emergency fire services and that no new fire stations or facilities would be needed in order to accommodate the anticipated increase in service calls resulting from the project.
- The City commented on the potential need for a pumping station to provide water service to the project site from the Blair Hills Community. It is not anticipated that a pumping station would be required for the project. However, if a pump station is required for utility connections to the visitor center, the Department would locate the facility at least 100 feet from any residences, and shielding would be provided, as appropriate, to eliminate any potential noise impacts from the pump unit. Section 2.4.3 of the Draft EIR has been revised to include this new information.
- The City suggested that fire hydrants should be provided along the access road and that all new buildings should have a full sprinkler system and Class A roofing. Fire hydrants would be installed for the project near the upper parking area and near the visitor center site. The design and construction of the visitor center and other project components would comply with all applicable building safety code and requirements.
- 4-24 The City recommended that the City of Culver City Fire Department should be allowed to review and approve the final plans for construction of the fire and water system. The Department will review and consider all City Fire Department requirements during the final design phase of the project.
- The City indicated that the Draft EIR analysis does not adequately analyze impacts associated with increased calls for police protection services resulting from the project. The City of Culver City Police Department was contacted to determine new or physically altered police facilities would be needed to meet the increased demand for police protection services in the area. Lieutenant Ariza indicated that existing staffing levels at the Police Department would be adequate to handle the expected increase in calls at park. As mentioned in the Draft EIR, the anticipated increase in calls

resulting from the new passive park facilities would be relatively minor and no significant impacts would occur.

4-26

The City requested that a sewer area study be conducted to ensure that the increased sewer load would not impact Culver City's sewer system. In Section 4.2.7 of the Draft EIR, it was determined that impacts related to utilities and service systems would be less than significant. The new park facilities would not generate a significant amount of wastewater that would exceed the capacity of the existing sewage systems. Based on the anticipated maximum square footage for the proposed visitor center, the project is expected to generate approximately 824 gallons per day (gpd). This is based on a generation rate of 80 gpd per 1,000 gross square feet for similar land uses (i.e., museum, library). These generation rates are provided in the City of Los Angeles Draft CEQA Thresholds Guide.

The project would connect to an 8-inch diameter City sewer line on Wright Crest Drive that serves the Blair Hills area to the east of the project site. The 8-inch line connects to the 96-inch City of Los Angeles North Outfall Replacement Sewer (NORS), which travels roughly north-south through the project area. The newly completed 132-inch City of Los Angeles East Central Interceptor Sewer (ECIS) line travels underneath the Blair Hills area and Culver City Park, connecting to the NORS south-west of the project site. All these City of Los Angeles lines are gravity-fed and drain north to the Hyperion Treatment Plant in El Segundo. Given the substantial capacity of these lines and their relative capacity to accommodate a substantial increase, the proposed project would not result in an impact to the local sewage system. The Department would comply with the City's required utility connection fees.

4-27

The City requested that a thorough drainage study be prepared for the project and reviewed by the City prior to construction. As discussed in Section 4.2.3, the project would not result in significant impacts related to hydrology and water quality. An NPDES permit would be required for the project and a SWPPP would be prepared to address water quality and drainage impacts during construction. The total paved area that would be created by the project would cover approximately 80,125 square feet. The new parking lots would have porous surfaces to allow drainage to infiltrate the surface and minimize runoff. The vast majority of the site would remain as natural open space and the project would not alter drainage patterns or substantially increase the quantity of runoff from the site.

4-28

A comment letter from Mary Ann Greene of Blair Hills was sent to the City Planning Department and included as an attachment to the City Resolution. Responses to that letter are therefore included in the responses to the City of Culver City comment letter. These responses include 4-29 through 4-39 below.

4-29

The commentor recommended the traffic intersections analyzed for the EIR should have included traffic flows west of La Cienega Boulevard. Please see response to comment 4-18.

4-30

The commentor recommended that the project allow parking on Jefferson Boulevard near the Hetzler Road intersection. Parking for park users would be provided inside the park. Along the project frontage on Jefferson Boulevard, both east and west of Hetzler Road, adequate sight distance would be necessary to ensure adequate traffic safety at the park entrance. Although the project includes several traffic safety features, potentially significant impacts would occur at the park entrance on Hetzler Road and Jefferson Boulevard due to potentially unsafe traffic conditions. Mitigation provided in the EIR prohibits parking on Jefferson Boulevard near Hetzler Boulevard to provide adequate sight distance and prevent unsafe traffic conditions at this intersection.

4-31

The commentor does not believe Hetzler Road should be used as a park entrance. A number of site access alternatives were considered in the design phase for this project. Please see response to comment 4-3. The commentor's suggestion has been provided to the Department for consideration in the decision-making process.

4-32

The commentor feels that the proposed parking area is too large and does not protect the pristine landscape, in addition to contributing to increased air pollution. The proposed project would develop a State park facility for local park users, as well as visitors to the project area. The project is designed to provide enough parking to adequately satisfy parking demand (up to 87 spaces during special events) for the proposed project. These parking lots would have a porous surface to allow drainage to infiltrate the surface and minimize runoff. The proposed project is the result of numerous public meetings and several months of outreach efforts undertaken by the Department to identify a consensus plan for the scenic overlook site. Through this process, a preferred plan was developed which provides adequate parking for park users. As discussed in Section 3.06 of the Draft EIR, construction and operation of the Scenic Overlook project would not significantly impact air quality.

4-33

The commentor suggested providing shuttle service to the park instead of constructing a parking lot inside of the park. The commentor believes that shuttle service would reduce air pollution by prohibiting park visitors from driving to the site. Park users, if not driving directly to the site, would drive to nearby shuttle pick-up areas. Therefore, air pollution from vehicle trips to the park would not be reduced. In addition, a shuttle system would require offsite parking on land not owned by the Department and other parking and land use compatibility impacts would potentially occur at these locations. The recommended use of a shuttle service has been provided to the Department for consideration in the decision-making process.

4-34

The commentor indicated support for Alternative 2. The commentor's support of the Multiple Access Roads Alternative will be provided to the Department for consideration in the decision-making process.

4-35

The commentor is concerned with the proposed project's impact to water service in the Blair Hills community and recommends that the state build a water tank for the project. As discussed in Section 4.2.7 of the Draft EIR, the

project would use a minimal amount of water. The majority of the project's landscaping and planting would not require permanent irrigation and use of the new State Park facilities would not consume large quantities of water. Water consumption at the visitor center would be limited to restrooms, water fountains, and facilities at the nourishment area, which would not result in significant impacts related to water use and consumption. Please see response to comment 4-22.

4-36

The commenter indicated that the Draft EIR does not adequately analyze potential impacts related to subsidence at the project site. As discussed in Section 3.8 of the Draft EIR, a geotechnical evaluation would be required prior to construction of the visitor center. The applicable seismic design requirements are discussed in Section 3.5.3 of the Draft EIR and are measures are included in Section 3.8.4 to ensure that a Certified Engineering Geologist prepares an engineering geologic and geotechnical evaluation and that appropriate slope stability safety factor criteria are incorporated into the project design. Incorporation of standard building code requirements and geotechnical evaluations described above would reduce any potential impacts related to subsidence and other potential geologic hazards at the project site to a less than significant level.

4-37

The commentor indicated that they believe the size of the proposed visitor center should be reduced. The commentor's request for a smaller visitor center will be provided to the Department for consideration in the decision-making process.

4-38

The commenter requested that the Department enter into a mutual aid pact with the City of Culver City Police Department regarding first response to the project site. The project would not change any City's police response requirements. A small number of emergency response calls may be generated by the project; however, the City Police Department has indicated that this would not significantly impact City police protection services. Please see response to comment 4-25.

4-39

The commentor requested that the Department facilitate further communications with the community in the vicinity of the proposed project. The commentor's request will be provided to the Department for consideration in the decision-making process.

### DEPARTMENT OF PARKS, RECREATION & COMMUNITY SERVICES

December 18, 2003

Mr. Ron Saenz
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, No. 270
San Diego, CA 92108

Re: Environmental Impact Report for the Baldwin Hill Scenic Overlook Project-Comments of the City of Inglewood

Dear Mr. Saenz:

Thank you for inviting the City of Inglewood to comment upon the scope and content of the environmental impact report regarding the Baldwin Hill Scenic Overlook project. The list of potential environmental impacts reflected in the CEQA Initial Study and Notice of Preparation appear to be sufficient in light of the main elements of the proposed project, which include (1) development of public access to the property, (2) construction of a visitor information center, (3) provision of visitor parking, and (4) protection and interpretation of the natural and cultural resources of the park and the adjacent Ballona Creek.

The inclusion of factors to ensure the project is reviewed from the perspective of its impact upon existing regional parks, recreation service providers, and cultural resources is well taken. Our preliminary assessment indicates that the project will not affect existing recreational opportunities at Edward Vincent Jr. Park or other park sites and recreational facilities in the City of Inglewood.

Inglewood appreciates the efforts that have been made by the California Department of Parks and Recreation to solicit the views of interested persons who may be impacted by the Baldwin Hills Scenic Overlook Project. The City looks forward to continued participation in the public review process and thanks the State for the opportunity to comment. The contact person for the City of Inglewood is Rita Gardner, Park Administration Superintendent. Ms. Gardner may be contacted at (310) 412-8750.

Sincerely,

Kevin L. Hawkins

Director

Letter 5: City of Inglewood

Comment No. Response

5-1 The City of Inglewood has indicated that the proposed project would not

affect the existing recreational opportunities at Edward Vincent Jr. Park or

other park sites and recreational facilities in the City.

To: Ron Saez California Department of Parks and Recreation Southern Service Center 8885 Rio San Diego Drive, No.270 San Diego, CA 92108 619-688-9954

From: Stefan and Michele Freeman 6207 Hetzler Road Culver City, CA 90232 310-558-4551

DATE: 1/25/2004

# Subject: Response to Baldwin Hills Scenic Overlook EIR Report

#### Mr.Saez.

Attached are the responses and concerns to the Environmental Impact Report from Hetzler Road and Tompkins Way residents. We feel at this time, our concerns for our neighborhood are not being addressed by the Department of Parks and Recreation and the EIR. Please take into consideration our concerns to ensure our property value, safety and privacy are taken into consideration.

### 2.4.1 Park Access

The convex mirror option does not fully address the safety to residents backing in and out of driveways. The two-way split road protects the safety entering and exiting our driveways that has not been a significant issue due to the light traffic when the park did not exist. We have experienced near misses when exiting our driveway over the last 8 months. This is still a safety issue that must be addressed.
What measures will be taken to close the Park access when the parking lot is full?

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- 2.4.5 Other Project Features
  - Fire Hydrants should be installed/included along Hetzler Road.
  - Tie Hetzler Road and Tompkins Way residents to Sewage system and water line.
  - Will gas services be installed on the site?

### 2.5 Construction Scenario

 Maintain cleanliness of Hetzler Road during construction phase with daily street sweeping.

# 3.2.4 Mitigation Measures /Light and Glare

 Low voltage accent street lighting should be included along Hetzler Road. This is a safety issue for walkers on the road way during non-daylight hours. Install safety and security lighting along roadway.

What measure will be put in place to prevent potential erosion or land slides	6-8
during construction?  • What upgrades will be completed to Hetzler Road to repair damage to the road from heavy truck traffic.	6-9
Pedestrian Safety Will a side walk be installed for walkers on Hetzler Road? There are children who walk to school on this street. This should be a primary concern for utilizing this as a recreational area.	6-10
Resident Safety Two burglaries have occurred of vehicles in January, 2004 at two homes on Hetzler. No criminal activity has occurred in over four years. The increased visibility of the homes and area will bring crime into the area. What measures will be put in place to eliminate the influx of crime? What are you doing to maintain the safety of the neighborhood for the residents?	6-11
<ul> <li>Geology and Soils</li> <li>What upgrades will be completed to the hillsides to protect from run-off and erosion during heavy rains.</li> </ul>	6-12
·	
<ul> <li>Areas of known Controversy / Unresolved Issues</li> <li>What is the effect on water pressure to Hetzler Road and Tompkins way residents with the increased demands for the visitor's site?</li> </ul>	6-13
• Will the visitor's site be on a septic system or the sewage system? Will residents home be tied into the new sewage system? What is the impact to the environment resulting from the excavation?	6-14
What are the measures being taken to restrict use of the park during non park hours?	6-15
<ul> <li>What are the measures being taken to prevent use of Hetzler road during non Park hours and allow residents access to and from their homes.</li> </ul>	6-16
<ul> <li>What noise mitigation measures are being taken?</li> </ul>	6-17
Transportation / Circulation  The study did not include consideration of the MTA transit station impact on	6-18
<ul> <li>traffic along Jefferson Blvd. Should be included.</li> <li>Residents on Hetzler back out of their driveway. The widening of the road and the</li> </ul>	6-19
increased traffic "446 daily trips" significantly increases the chance for accidents on Hetzler. Option of the two-way split road is the best option for mitigation of this safety issue.	6-20
<ul> <li>A sidewalk along Hetzler Road needs to be installed for pedestrian safety.</li> </ul>	6-21

### **Public Services**

- We are Culver City residents and pay Culver City taxes. We have Culver City Police and Fire departments services. This is a minimum expectation for the residents on Hetzler Road and Tompkins way.
- 6-23

6-25

You do not say that Culver City Police department would maintain service to residents on Hetzler and Tompkins way. Our Public Services are currently with Culver City and want to maintain our current public services. Is this an attempt to change from Culver City Services to LA County? What is change is being proposed by this statement.

# 5.2.2 Multiple Access Roads (Alternative 2)

- The multiple road alternative which includes splitting the road into two separate roads part way up the hill is what the residents of Hetzler and Tompkins way want.
- The EIR states that the split road alternative could not be completed unless the visitors center was located midway up the north facing slope. This is not true. Install the "Alternative 3" visitors center with the Alternative-2 roadway is a feasible option. Install the two-way split road and install the Alternative 3 Visitors Center Site.

We look forward to hearing from you. Below are the signatures of our neighbors stating that they are in full agreement with this letter and its content.

Sincerely,

Multiplicates - Freeman

Stefan Freeman (Hetzler Representative)

Michele Carter-Freeman

Letter 6:	Citizen Letter 1 (Residents of Hetzler Road and Tompkins Way)
Comment No.	Response
6-1	Several residents of Hetzler Road and Tompkins Way (commentors) are concerned about safety for residents backing in and out of driveways on Hetzler Road. Please see response 4-3.
6-2	The commentors are concerned about parking when the parking lots at the scenic overlook become full. The traffic and parking study (Appendix D) of the Draft EIR projected a peak parking demand of 87 spaces. Therefore, it is anticipated that the 110 parking spaces in the park would accommodate all park users. Parking would be prohibited along both sides of Hetzler Road between Jefferson Boulevard and the top of the hill. Overflow parking would not infringe upon Hetzler Road and Tompkins Way but would occur on designated portions of Jefferson Boulevard. The park would not close if the parking lots reached capacity. Mitigation has been provided in Section 2.0 of the Final EIR to ensure that no parking would occur on Hetzler Road.
6-3	The commentors suggested that fire hydrants should be installed on Hetzler Road. Fire hydrants would be installed for the project near the upper parking area and near the visitor center site, in compliance with applicable code requirements.
6-4	The commentors recommended connecting their homes to the park sewage system and water line. The sewage and water line for the proposed project would be connected to existing lines in the nearby community of Blair Hills. The comment has been provided to the Department for review and consideration in the decision-making process.
6-5	The commentors asked if gas service would be installed for the project. All utility connections to the proposed visitor center would be provided from the Blair Hills community.
6-6	The commentors requested that Hetzler Road cleanliness is maintained during construction. Mitigation measure AIR-6 in Section 3.6 of the Draft EIR would ensure that all paved streets are swept at least once per day where there is evidence of dirt that has been carried onto the roadway.
6-7	The commentors requested installation of lighting on Hetzler Road. Currently, the project does not include lighting on Hetzler Road. The suggestion has been provided to the Department for review and consideration in the decision-making process.
6-8	The commentors are concerned with erosion and landslides during construction. Standard Best Management Practices (BMPs) would be employed for the project, including soil stabilization measures (see page 2-11 of the Draft EIR). In addition, mitigation measure GEO-2 in Section 3.8, Geology and Soils, of the Draft EIR would ensure that the plans and specifications for the project incorporate proper slope stability safety factor

	criteria. As such, the project would not result in significant impacts related to erosion or landslides.
6-9	The commentors are concerned with damage to Hetzler Road during construction. As part of the project, Hetzler Road would be widened and improved. A total of 2,850 linear feet of paved roadway would be improved and/or created within the park. Construction of the park would not damage Hetzler Road; rather, it would provide a new paved road for park visitors and residents.
6-10	The commentors are concerned with pedestrian safety on Hetzler Road and recommended that a sidewalk be installed. Currently, the project does not include a sidewalk on Hetzler Road. The suggestion has been provided to the Department for review and consideration in the decision-making process.
6-11	The commentors are concerned about neighborhood safety. Park rangers would be staffed at the park during normal operating hours. The City of Culver City Police Department would continue to service the residences on Hetzler Road and Tompkins Way. The comment has been provided to the Department for review and consideration in the decision-making process.
6-12	The commentors are concerned with run-off and erosion during heavy rains. The potential for the occurrence of landslides and soil erosion as a result of the project is discussed in Section 3.8, Geology and Soils. Mitigation measure GEO-2 in Section 3.8, Geology and Soils, of the Draft EIR would ensure that the plans and specifications for the project include proper slope stability safety factor criteria. Incorporation of BMPs and the mitigation measure would ensure that impacts from erosion would be less than significant impacts would result. In addition, the project includes native habitat restoration, which would further protect the hillside from potential erosion.
6-13	The commentors are concerned about the effects the project may have on water pressure. A water line for the proposed project would be connected to existing lines in the nearby community of Blair Hills. The new visitor center would not impact water pressure on Hetzler Road or Tompkins Way.
6-14	The commentors are concerned with the impacts associated with the new sewage systems at the visitor center. As discussed above, all utility connections would be provided from the Blair Hills community. The project would not require any new septic tanks for sewage disposal. Please see response 4-26.
6-15	The commentors are concerned with after-hours park use. A gate would be installed at the entrance to the park that would prohibit visitor access after the closing hours of the park; however, the gate would not preclude or restrict residential access on Hetzler Road and Tompkins Way. Residential access to these properties would be maintained at all times.
6-16	The commentors are concerned with daily use of Hetzler Road after the park is closed. As discussed above, a gate would block the entrance to the park

	after closing and access through the park would not be available after the closing hours of the park. Please see response 6-15.
6-17	The commentors are concerned with noise impacts from the project. Mitigation measures pertaining to noise are included in Section 3.7.4 of the Draft EIR. These measures would reduce construction and operational noise impacts to a less than significant level. Please see responses 4-10 and 4-11.
6-18	The commentors indicated that the traffic study did not consider the MTA transit station impact on traffic on Jefferson Boulevard. Local public transit services are described in Appendix D. The project would not impact any of these transit routes or facilities.
6-19	The commentors are concerned about the increased chance for accidents on Hetzler Road. Please see response to comment 4-3.
6-20	The commentors recommend implementation of Alternative 2. Several different access routes were considered in the public meetings held during the project design phase. The proposed access route was selected based on a number of factors (environmental, engineering, cost, aesthetics, etc.). The comment has been provided to the Department for review and consideration in the decision-making process.
6-21	The commentors recommend a sidewalk be installed on Hetzler Road. Please see response to comment 6-10.
6-22	The commentors identify that they are serviced by Culver City Police and Fire Department services. The Culver City Police and Fire Department would continue to serve residents of Hetzler Road and Tompkins Way. As shown in Section 3.9 of the Draft EIR, project impacts to police and fire service would be less than significant. Please see responses 4-23 and 4-24.
6-23	The commentors are concerned about police service to their homes. Please see response to comment 6-22.
6-24	The commentors recommend implementation of Alternative 2. Please see response to comment 6-20.
6-25	The commentors recommend combining elements of Alternatives 2 and 3. As discussed above, several alternatives were considered in the public meetings held during the project design phase. The project alternatives were selected because they best addressed the project objectives (Section 2.3 of the Draft EIR). The comment has been provided to the Department for review and consideration in the decision-making process.

Southern Service Center 8885 Rio San Diego Drive, Suite 270 San Diego, CA 92108

Address the need to protect immediate neighbors from potential impacts of public use of the site!!!

We are the immediate property owners, neighboring the formerly known Vista Pacifica Site, now called Baldwin Hills Overlook Park Project...

We want to address the concern that our voice and opinions have not been heard or asked at all. Even the report examples of proposed park plan have pictures of the wrong park site (Kenneth Hanh Park )in their report. That tells something about the quality of the report.

We have real concerns as the private property owners on the Blair Hills side:

#### ARSON AND FIRE HAZARD:

Having hundreds of people wandering thru dry vegetation next to the oil and gas wells will most definitely create a fire hazard. We have seen it happening just recently in the mountain communities, which were destroyed by wild

The Kenneth Hanh Park has had a fire almost every year on the hillside. We do not need increased fire scare to Blair Hills Community. Our Vista Pacifica site is bordering many houses and our park is in direct contact to many oil pumps and wells. If the oil wells ignite, it will be a major catastrophe and health hazard for the whole L.A. basin and it will destroy our living conditions.

SAFETY, TRASH AND NOISE PROBLEM Concerned Of Night Time Entries Of The Park:

People will keep coming thru Blair Hills to the park.

Proposition #1: State Parks has to built an electric gate to the 7000 block of Wrightcrest Drive:

-The public park has already increased traffic thru our community. We live in the end of Wrightcrest drive and demand a special gate to be built into the end of Wright Terrace and beginning of 7000 block of Wrightcrest drive, where there is intersection of Wrightcrest Drive and street narrows. This makes it easy to turn back. This gate should be closed after sunset time, when park is closed thru the night and only allow the property owners, police, ambulances and fire trucks thru. It should operate only by using an access card.

This is the only way of keeping people entering the park at night time thru our street. There have been people, sometimes gangs, sometimes druken teenagers, even large groups of 10 to 15 people, causing very loud noises, (playing very loud music and yelling of expletive words) and trashing our cul de sac turning point with broken bottles and trash.

They also urinate and fight loudly on our properties. At 7015 Wrightcrest Drive I have had people got into my property, painting graffiti on walls and violated my car by breaking the front window. I am fed up of cleaning after these people. This has to stop.

We are for No Project proposition. No visitors center building. The developing of the visitor building is unnecessary and will only create problems to us.

The parks should only be developed for trails, hiking and preserving nature and views as it is now. The only undeveloped great open space in this city should be kept for quiet appreciation of magnificent views above the city. We don't need restaurants or commercial shops here. The visitor center, if needed, should be built to the Kenneth Hahn Park, that has everything from controlled parking, and utilities already solved.

Sincerely,

Pekka Rautionmaa

7015 Wrightcrest Drive (last house on Wrightcrest Drive-left side)

Culver City, CA 90232

310-202-6596

7016 Wought Cri-t pri, Culon Coty CA 9023
310-204-4225

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Letter 7:	Citizen Letter 2 (Pekke Rautionmaa, Stanford J. Searle Jr.)
Comment No.	Response
7-1	The commentors questioned the adequacy of the EIR analysis. These comments have been provided to the Department for review and consideration in the decision-making process.
7-2	The commentors expressed concerns regarding the potential for fires in the project area. The project would not result in hazards related to wildland fire risk. Fire hydrants would be installed for the project near the upper parking area and near the visitor center site. The design and construction of the visitor center and other project components would comply with all applicable building safety code and requirements.
7-3	The commentors expressed concerns about night time entries into the park. Please see response 6-15.
7-4	The commentors expressed concerns about after hour use of the site and requested that the Department install a controlled access gate on Wrightcrest Drive. As discussed in response 6-15, public access to the park would be limited to park operating hours and residential access would be provided at all times. The request to install an access gate on Wrightcrest Drive has been provided to the Department for review and consideration in the decision-making process.
7-5	The commentors identified their preference for the No Project Alternative and suggested that the visitor center be relocated to Kenneth Hahn State Recreation Area. These comments have been provided to the Department for review and consideration in the decision-making process.

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From the Desk of Jackie McCain 4135 Lafayette Pl. Culver City, CA. 90232 310-838-6941

February 19, 2004

Mr. Ron Saenz
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA. 92108

RE: DEIR Baldwin Hills Scenic Overlook Project

This project is 58 acres of hillside land located within the City of Culver City.Intend to construct a 10,300-square-foot visitor center, including a1400-square-foot food center. This is a park for visitors and local schools

The entrance should be a combination of Multiple Roads entry at Jefferson at the northeastern edge of the site. The road would split to protect the six homes on Hetzler and Tompkins Way. The visitors building would be changed to fit into the top of the hill.

8-1

It would assist the WLA College if the road from Jefferson and the northeastern edge of the site follow around Blair Hills to LaCienaga since it is essential that the College have a second entrance.

The visitors building and dining building must be built with double pain and non-glare windows. Lighting should reflect down along paths and parking lots. The 110 parking spaces are not sufficient. School children will come in a bus and if you plan on Culver City Bus to travel to the Visitors Center they need parking spaces and turn around room.

Roads and turn arounds need to be heavy construction material to also hold emergency equipment.

In the Kenneth Hahn State Recreation Area General Plan Amendment and EIR (6/02) Page 4-26 "Prescribed burning is included in the KHSRA General Plan Amendment as a potential activity for controlling invasive plant species".

Culver City Fire department rules that your water pressure be sufficient and fir hydrants be 300 feet apart and workable before construction begins. Culver City has rules for construction hours,, however, for your neighbors it would be nice if you took Sundays off

You will connect probably to the North Portal sewer line and please connect the six

A SERVICE GRAD

Thank you for the opportunity to respond.

Jackie McCain

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Letter 8:	Citizen Letter 3 (Jackie McCain)
Comment No.	Response
8-1	The commentor supports multiple access roads and relocation of the visitor center to the top of the hill. These recommendations have been provided to the Department for review and consideration in the decision-making process.
8-2	The commentor suggested that the park entrance road be extended around the northeastern edge of the site around Blair Hills to La Cienega Boulevard. A number of site access alternatives were considered in the design phase for this project. The proposed project and preferred access route is the result of numerous public meetings and several months of outreach efforts undertaken by the Department to identify a consensus plan for the scenic overlook site. The commentor's suggestion has been provided to the Department for consideration in the decision-making process.
8-3	The commentor provided recommendations for the design of the visitor center windows and indicated that the proposed parking supply is not adequate. As discussed in Section 3.2.3, the project would not result in significant impacts related to light and glare. The traffic and parking study (Appendix D) of the Draft EIR projected a peak parking demand of 87 spaces. Therefore, it is anticipated that the 110 parking spaces in the park would accommodate all park users.
8-4	The commentor suggested that the access roads be constructed to accommodate and withstand emergency vehicles. Please see response 6-9.
8-5	The commentor indicated that the KHSRA General Plan Amendment identifies prescribed burning as a potential means of controlling invasive species. The proposed Scenic Overlook project does not include any plans for prescribed burning in the Baldwin Hills.
8-6	The commentor identified several City of Culver City requirements for design and construction. The Department is committed complying with the City's requirements where feasible. For example, as stated in Section 3.7.3 of the Draft EIR, construction activities would not be conducted outside the hours allowed by the City of Culver City noise ordinance unless an extended hours permit is obtained from the City.
8-7	The commentor indicated that the project would probably connect to the North Portal sewer line and requested that six homes be connected as well. Please see response 4-26.

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# **COUNTY OF LOS ANGELES**

# DEPARTMENT OF PUBLIC WORKS

"Enriching Lives"

900 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (626) 458-5100 www.ladpw.org

ADDRESS ALL CORRESPONDENCE TO: P.O. BOX 1460 ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: WM-4

February 23, 2004

Mr. Ron Saenz California Department of Parts and Recreation 8885 Rio San Diego Drive, No. 270 San Diego, CA 92108

Dear Mr. Saenz:

# RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT BALDWIN HILLS SCENIC OVERLOOK PROJECT CITY OF BALDWIN HILLS

Thank you for the opportunity to provide comments on the subject document. The project proposes to develop public access to the Baldwin Hills Scenic Overlook property via Hetzler Road, construct a new 10,300-square-foot visitor center, and provide a 110-space parking lot, while providing protection and interpretation of the natural and cultural resources of the park and the adjacent Ballona Creek. The project would restore the site's natural ridgeline and topography that were previously graded and would emphasize restoration of native coastal sage scrub habitat. The proposed project will provide much needed recreation and educational open space for the residences who live in this highly under-served area. The project site is located in the Baldwin Hills area in southwestern Los Angeles County and is part of the 387-acre Kenneth Hahn State Recreation area. We have reviewed the submittal and offer the following comments.

### **Environmental Programs**

As projected in the Los Angeles County Countywide Siting Element, which was approved in late 1997 by a majority of the cities in the County of Los Angeles with a majority of the population and by the County Board of Supervisors in January 1998, a shortfall in permitted daily landfill capacity may be experienced in the County within the next few years. The construction and predevelopment activities associated with the proposed project and the postdevelopment operation over the life of the proposed project will increase the generation of solid waste and may negatively impact solid waste management infrastructure in the County. In particular, Page 2-10 notes there will be approximately 67,000 cubic yards of excavated material exported from the site

9-1

during development; however it is not made clear if the material will be reused or recycled, or if it is planned to be disposed.

Therefore, the proposed environmental document must identify what measures the project proponent plans to implement to mitigate the impact. Otherwise, the cumulative impact of solid waste generation from individual projects will negatively impact the solid waste management infrastructure in the County. Mitigation measures may include, but are not limited to, implementation of waste reduction and recycling programs to divert the solid waste, including construction and demolition waste and the excavated material, from the landfills.

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The existing hazardous waste management (HWM) infrastructure in this County is inadequate to handle the hazardous waste currently being generated. The proposed project may generate hazardous waste and/or household hazardous waste, which could adversely impact existing HWM infrastructure. This issue should be addressed and mitigation measures provided. In particular, if any of the excavated soil is contaminated by or classified as hazardous waste by an appropriate agency, the soil must be appropriately managed and disposed.

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each development project to provide an adequate storage area for collection and removal of recyclable materials. The environmental document should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for the 10,300 sq ft visitor center described in this project.

The Los Angeles County Building Code, Section 110.4, requires that buildings or structures adjacent to or within 200 feet (7620 mm) of active, abandoned or idle oil or gas well(s) be provided with methane gas protection systems. If the project site contains or lies within 200 feet of active, abandoned or idle oil or gas wells, this issue should be addressed and mitigation measures provided, and our Environmental Programs Division must be contacted for issuance of necessary permits.

The Los Angeles County Uniform Building Code, Section 110.3, requires that a building or structure located on or within 1,000 feet (304.8m) of a landfill containing decomposable material must be protected against landfill gas intrusion. The project site appears to be located on or within 1,000 feet of a landfill containing decomposable material. This issue should be addressed and mitigation measures provided. The discussion should include subsurface lateral migration of landfill gas, migration detection, and control and protection systems for affected enclosed buildings and

structures. Our Environmental Programs Division must be contacted for issuance of necessary permits.

Should any operation within the subject project include the construction, installation, modification or removal of underground storage tanks, industrial waste treatment or disposal facilities, and/or stormwater treatment facilities, our Environmental Programs Division must be contacted for required approvals and operating permits.

All development and redevelopment projects which fall into one of the Standard Urban Storm Water Mitigation Plans (SUSMP) project types, characteristics or activities, must obtain SUSMP approval by the appropriate agency.

Food service establishments may be required to provide a grease treatment device and will be subject to review and approval by our Environmental Programs Division. It is unclear from the project description if the "1,400 square foot nourishment center" (Page 2-8) will include a food service facility.

If you have any questions, please contact Ms. Elizabeth Morris at (626) 458-3533.

# Geotechnical and Materials Engineering

The proposed project will not have significant environmental effects from a geology and soils standpoint, provided the appropriate ordinances and codes are followed. Portions of the project site are locate within mapped potential seismically induced landslide areas, per the State of California Seismic Hazard Zone Map, Hollywood Quadrangle. However, seismic slope stability analyses are not warranted at this time. seismic stability analyses, conforming to the requirements of the State of California Division of Mines and Geology Special Publication 117, should be conducted at the tentative map and/or grading/building plan stages.

9-9

If you have any questions, please contact Mr. Amir Alam at (626) 458-4925.

# **Land Development**

Hydrology and Standard Urban Storm Water Mitigation Plan (SUSMP) Review

This environmental document has been reviewed only for drainage and SUSMP impacts to Los Angeles County areas and facilities. There are no comments at this time.

If you have any questions, please contact Mr. Michael Hales at (626) 458-4921.

# Transportation Planning

The proposed project would not have any significant impacts on Los Angeles County Highways.

If you have any questions, please contact Mr. Hubert Seto at (626) 458-4349.

# Traffic and Lighting

The project will not have significant impact to County and County/city roadways in the area. No further information is required.

We recommend that the cities of Culver City and Los Angeles review this document for significant impacts/mitigations within their jurisdictions.

If you have any questions regarding the review of the document, please contact Ms. Jennifer Frary of our Traffic Studies Section at (626) 300-4792.

# Watershed Management

The proposed project should include investigation of watershed management opportunities to maximize capture of local rainfall on the project site, eliminate incremental increase inflows to the storm drain system, and provide filtering of flows to capture contaminants originating from the project site.

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If you have any questions regarding the above comments or the environmental review process of Public Works, please contact Ms. Massie Munroe at the above address or at (626) 458-4359.

Very truly yours,

JAMES A. NOYES Director of Public Works

ЖОД Н. КИВОМОТØ

Assistant Deputy Director
Watershed Management Division

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### Letter 9: County of Los Angeles Department of Public Works (Late)

#### Comment No.

#### Response

9-1

The County of Los Angeles Department of Public Works (DPW) indicated that the Draft EIR does not adequately discuss how the excavated material form the project would be disposed. As discussed in Section 2.5 of the Draft EIR, a large amount of the construction debris would be recycled. Those materials not recyclable would be disposed at nearby landfills. It is the intent of the Department to reuse or recycle all suitable fill material that is exported from the project site.

9-2

DPW is concerned that soil excavated during project construction would impact the hazardous waste management (HWM) infrastructure in the County. The Baldwin Hills Scenic Overlook is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, the former landfill in the project area was used for construction debris and soil and no hazardous materials are expected to occur in the project area. Although it is not likely, if any hazardous wastes are encountered during construction, these wastes would be disposed of in accordance with all applicable handling and disposal requirements.

9-3

DPW requests that the document include and discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for the visitor center. The Department would provide adequate recyclable storage areas during project construction, in compliance with the California Solid Waste Reuse and Recycling Access Act of 1991, as amended. Operation of the project would generate small amounts of green waste due to the limited amount of irrigated landscaping proposed for the site. In addition, the uses proposed for the site would not generate significant quantities of recyclable materials. Nevertheless, recycling facilities would be provided at the Scenic Overlook site.

9-4

DPW is concerned that the project site is located within 200 feet of an active, abandoned, or idle oil well. The project site is located near the Inglewood Oil Field, which covers approximately 700 acres across the Baldwin Hills. Three plugged and abandoned dry wells are located on the eastern portion of the project site and one is located within 200 feet of the proposed visitor center. Roadway improvements and construction of the parking areas and visitor center would not be located directly above any abandoned oil well sites. Although the potential for methane gas intrusion from these dry wells is low, no studies have been conducted to determine the potential for methane gas impacts in the project area. To ensure that that potential impacts resulting from methane gas would not occur, a new measure (GEO-3) has been included in the Final EIR. This measure would ensure that potential impacts related to methane gas migration and subsidence would be less than significant.

9-5

DPW is concerned that the project site is located within 1,000 feet of a landfill containing decomposable material. Development of the visitor center

would occur in an area occupied by a former landfill. Past geotechnical investigations indicate that the landfill boundaries may partially overlap the footprint of the proposed visitor center. Because the landfill was used for disposal of soil and construction debris, decomposition rates and associated methane gas levels are expected to be low. As discussed above, a new measure (GEO-3) has been included in the Final EIR to address potential impacts associate with landfill-related hazards, including subsidence and methane gas migration.

9-6

DPW requires approvals and permits, should the project include construction, installation, modification, or removal of underground storage tanks, industrial waste treatment or disposal facilities, and/or stormwater treatment facilities. The proposed project does not include the construction, modification, or removal of any of these features; thus, coordination with DPW is not required.

9-7

DPW stated that the project may require Standard Urban Stormwater Mitigation Plan (SUSMP) approval by the appropriate agency. The proposed project includes a parking lot that would be larger than 5,000 square feet and have over 25 parking spaces; therefore, a SUSMP would be required. Section 2.5 of the Draft EIR has been revised to include SUSMP requirements.

9-8

DPW requires that food service establishments provide a grease treatment device subject to review and approval by the Environmental Programs Division. The proposed visitor center and nourishment area would not include a food service facility and would not be subject to review and approval by DPW.

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DPW recommends that a detailed seismic stability analysis is conducted at the tentative map and/or grading/building plan stages. Mitigation measures pertaining to geology and soils are included in Section 3.8.4 of the Draft EIR. These measures would reduce potential seismic stability impacts to a less than significant level.

9-10

The DPW divisions of Land Development, Transportation Planning, and Traffic and Lighting have no comments on the EIR.

9-11

The Watershed Management Division suggests the proposed project investigate watershed management opportunities. The proposed project has a number of elements that would increase watershed management opportunities in the project area. In addition to the NPDES and SUSMP requirements, the project would include a number of measures to reduce water quality impacts. For example, the parking lots would have a porous surface to allow drainage to infiltrate the surface and minimize runoff. A number of areas on the site would also be revegetated with native plants, greatly reducing the irrigation requirements for the project.

# SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Public Resources Code, Section 21081.6 (Assembly Bill 3180) requires that mitigation measures identified in environmental review documents prepared in accordance with CEQA are implemented after a project is approved. Therefore, this Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure compliance with the adopted mitigation measures during the pre-construction, construction, and post-construction phases of the Baldwin Hills Scenic Overlook Project.

The California Department of Parks and Recreation (Department) is the agency responsible for implementation of the mitigation measures identified in the EIR. This MMRP provides the Department with a convenient mechanism for quickly reviewing all the mitigation measures including the ability to focus on select information such as timing. The MMRP includes the following information for each mitigation measure:

- the phase of the project during which the required mitigation measure must be implemented;
- the phase of the project during which the required mitigation measure must be monitored;
- the enforcement agency; and
- the monitoring agency.

The MMRP also includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor, the date of the monitoring activity, and any related remarks for each mitigation measure.

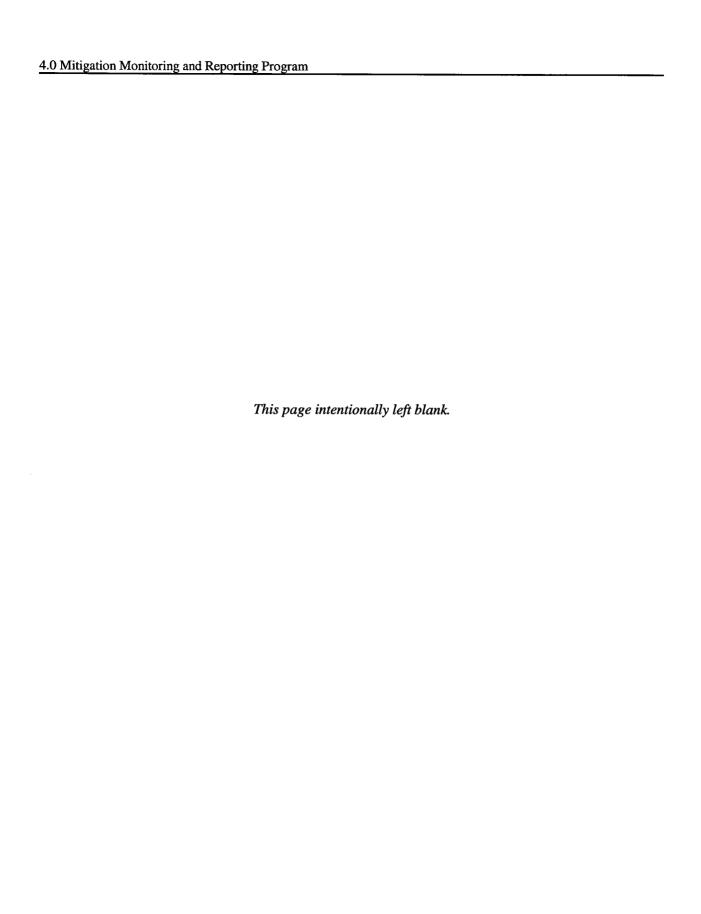


Table 4-1. Mitigation Monitoring and Reporting Program

	S					
mpliance	Remarks					
Verification of Compliance	Date					
Verif						
:	Initial				i	
	Enforcement Agency		California Department of Parks and Recreation		California Department of Parks and Recreation	California Department of Parks and Recreation
Monitoring	Phase <sup>1</sup>		Construction; Operation		Construction	Construction
Implementation	Phase <sup>1</sup>		Final Plans and Specifications		Final Plans and Specifications	Final Plans and Specifications
	Mitigation Measure	AESTHETICS	AES-1 The Department shall use technologies to reduce light emissions and include full cutoff luminaries, lowreflectance surfaces, and low-angle spotlights.	BIOLOGICAL RESOURCES	BIO-1 Mitigation for impacts to coastal sage scrub, disturbed coastal sage scrub, and cactus scrub shall be provided by the on-site revegetation of coastal sage coastal sage scrub at a 1:1 ratio (1.9 acres). The 1.9 acres of coastal sage scrub mitigation shall occur within temporary impact areas along the access road and surrounding the upper parking lot area. Revegetation will consist of native species appropriate to the site (occurring within the Los Angeles Basin and of local genetic stock). A formal restoration plan will be developed by the Department prior to the start of ground clearing and shall include details regarding planting methods, performance criteria, exotic control, long-term monitoring, and potential remedial measures.	BIO-2 All plant material used in habitat restoration and native landscaping shall consist of plant species that are native to the Los Angeles Basin. All plant material shall be of local genetic strains. All plant material shall be approved by a Department Ecologist prior to introduction to the site.

<sup>&</sup>lt;sup>1</sup> The Implementation and Monitoring phases are broken down into four categories: Final Plans and Specifications, Pre-Construction, Construction, and Operation. "Final Plans and Specifications" indicates that the mitigation measure must be incorporated into the final approved design, plans, and specifications for the project. "Pre-Construction" refers to measures that are required prior to the start of construction. "Construction" refers to all aspects of project construction, including, but not limited to, site preparation, paving, material hauling, and construction of new facilities. "Operations" includes all measures that must be implemented during routine operations of the park.

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	Implementation	Monitoring			Verification o	Verification of Compliance
Mitigation Measure	Phase <sup>1</sup>	Phase <sup>1</sup>	Enforcement Agency	Initial	Date	Remarks
BIO-3 To increase the functionality of a future habitat linkage/movement corridor to the south of the site, the upper parking lot shall be designed according to the following guidelines:	Final Plans and Specifications	Construction	California Department of Parks and Recreation			
The upper parking lot length shall be shortened to the extent possible given the regulatory constraints to provide parking for park users. The parking lot shall consist of a permeable surface (stabilized earth or similar material). The parking lot hardscapes (islands, planters, etc.) shall be landscaped with native species appropriate to the vicinity. Irrigation in the parking lot area shall be temporary and only provided to help establish native plant species. The upper parking lot shall be closed to the public after dark (except for a limited number of special events). Speeds shall be limited to less than 15 miles per hour within the parking lot and along the future southern access road. Lighting shall be turned off each night after the park closes, except during special events.						
BIO-4 To minimize incidental impacts to sensitive habitats, construction fencing shall be placed along the construction limits of work. Fencing and signage between the development and dedicated native habitats shall be established and maintained.	Final Plans and Specification; Preconstruction	Construction	California Department of Parks and Recreation			
<b>BIO-5</b> A biological monitor shall be present during grading or ground clearing directly adjacent to sensitive habitats (i.e., coastal sage scrub, cactus scrub).	Final Plans and Specifications	Construction	California Department of Parks and Recreation	-		
<b>BIO-6</b> To the extent feasible, plants, soil, and woody material from the areas to be impacted shall be made available for salvage and use in habitat restoration efforts.	Final Plans and Specifications	Construction	California Department of Parks and Recreation			
BIO-7 To the extent feasible, project construction shall be	Final Plans and	Construction	California Department of			

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	Implementation	Monitoring	į		Verification of Compliance	Compliance
Mitigation Measure	Phase <sup>1</sup>	Phase <sup>1</sup>	Enforcement Agency	Initial	Date	Remarks
AIR QUALITY						
AIR-1 All heavy construction equipment shall be equipped with particulate filters, per the manufacture's instructions.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-2 All heavy construction equipment shall be powered with low sulfur fuels, as feasible.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-3 All equipment shall be properly tuned and maintained according to manufacturer's specifications.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-4 All equipment shall use electricity from power poles rather than temporary diesel power generators to the extent feasible.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-5 Trucks shall not idle for longer than 10 minutes.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-6 Parking for construction vehicles shall be configured to minimize traffic interference.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-7 Temporary traffic controls shall be implemented during all phases of construction to maintain a smooth traffic flow.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-8 Construction activities that affect traffic flow on the	Final Plans and	Construction	California Department of			

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	Implementation	Monitoring			Verification o	Verification of Compliance
Mitigation Measure	Phase <sup>1</sup>	Phase <sup>1</sup>	Enforcement Agency	Initial	Date	Remarks
	Construction					
AIR-16 For paved road track-out, all haul vehicles shall be covered.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-17 Construction activities shall be scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-18 Non-toxic stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for ten days or more) in accordance with manufacturer's specifications.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-19 Wheel washers shall be installed where vehicles enter and exit the construction site onto paved roads or trucks and equipment shall be washed off as they leave the site for each trip.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-20 A construction point-of-contact shall be appointed on-site to act as a community liaison concerning on-site construction activity including resolution of issues related to PM <sub>10</sub> generation.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-21 All earthmoving activities shall be ceased or water shall be applied to soil not more than 15 minutes prior to moving such soil.	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			
AIR-22 For disturbed surfaces to be left inactive for several days, water shall be applied with a chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of 6 months; or chemical stabilizers shall be applied prior to wind event; or	Final Plans and Specifications; Construction	Construction	California Department of Parks and Recreation			

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	Implementation	Monitorine			Verification o	Verification of Compliance
Mitigation Measure	Phase <sup>1</sup>	Phase <sup>1</sup>	Enforcement Agency	Initial	Date	Remarks
NO-4 No amplified music shall be permitted at the visitor center after 10 p.m. under any circumstances.	Operation	Operation	California Department of Parks and Recreation			
GEOLOGY AND SOILS						
GEO-1 Prior to issuance of completion of plans and specifications, the Department shall retain a California Certified Engineering Geologist (CEG) and an earthquake specialist who will prepare for the Department's review and approval, an engineering geologic and geotechnical evaluation of the visitor center site to determine the applicable ground motion parameters. The recommendations from this report, along with the requirements of the Uniform Building Code (UBC 1997) and local building codes, shall be incorporated into the design of the visitor center.	Pre- Construction; Final Plans and Specifications	Final Plans and Specifications	California Department of Parks and Recreation			
GEO-2 The plans and specifications for the project shall be reviewed by a CEG for compliance with PRC 2693(c) and CSG's Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California. In addition, the CEG shall review the plans and specifications to ensure that all slopes meet acceptable slope stability safety factor criteria, including the reconfigured hillside area. Compliance shall be documented in the geologic and geotechnical evaluation. If necessary, additional slope stabilization measures shall be identified and incorporated into the project design.	Pre- Construction; Final Plans and Specifications	Final Plans and Specifications	California Department of Parks and Recreation			
GEO-3 The plans and specifications for the project shall be reviewed by a CEG to ensure that the soils conditions underlying the project site are suitable for development of the visitor center. This will include an evaluation of the potential for other organic material in the former landfill that may decompose and generate methane gas. Methane	Pre- Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	California Department of Parks and Recreation			

	Implementation	Monitoring			Verification o	Verification of Compliance
Mitigation Measure	Phase <sup>1</sup>	Phase <sup>1</sup>	Enforcement Agency	Initial	Date	Remarks
gas levels will be tested and subsidence levels will be estimated based on this information. If subsidence and/or						
methane gas levels are determined to require mitigation,						
project to reduce these impacts to acceptable levels. Such						
measures may include:						
<ul> <li>Excavation and recompaction of fill materials under the building foundation;</li> </ul>						
Building design modifications to avoid methane gas buildup and accumulation in the foundation						
and structure; and						
Implementation of a methane gas monitoring						
program.						

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Baldwin Hills Scenic Overlook Final EIR 4.0-Mitigation Monitoring and Reporting Program-FEIR 08/13/03

# APPENDIX D TRAFFIC AND PARKING STUDY

This information supplements Appendix D of the Draft EIR.

# CHAPTER 9 TRAFFIC SIGNALS AND LIGHTING

# Traffic Signals, Basic Information and Warrants 9-01

#### 9-01.1 Introduction

A traffic signal is an electrically powered traffic control device, other than a barricade warning light or steady burning electric lamp, by which traffic is warned or directed to take some specific action.

The following types and uses of traffic signals are discussed in this chapter: Traffic Control Signals, Pedestrian Crossing Signals, Ramp Metering Signals, Flashing Beacons, Lane-use Control Signals, Traffic Control at Movable Bridges, Priority Control of Traffic Signals, Traffic Signals for Onelane, Two-way Facilities and Traffic Signals for Construction Zones.

Traffic control signals are devices for the control of vehicle and pedestrian traffic. They assign the right of way to the various traffic movements.

Traffic control signals have one or more of the following advantages:

- 1. They provide for the orderly movement of traffic.
- 2. They increase the traffic handling capacity of the intersection.
- 3. They reduce the frequency of certain types of accidents, especially the right angle type.
- They can be coordinated to provide for continuous or nearly continuous movement of traffic at a definite speed.
- They permit minor street traffic, vehicular or pedestrian, to enter or cross continuous traffic on the major street.

Experience shows that the number of rightangle collisions may decrease after the installation
of signals, but the number of rear-end collisions
may increase. The installation of signals may
increase overall delay and reduce intersection
capacity. Consequently, it is of the utmost
importance that the consideration of a signal
installation and the selection of equipment be
preceded by a thorough study of traffic and roadway
conditions made by an engineer experienced and
trained in this field. Equally important is the need
for checking the efficiency of a traffic signal in
operation. This determines the degree to which the
type of installation and the timing program meet the
requirements of traffic.

#### 9-01.2 Traffic Signal Warrants

The justification for the installation of a traffic signal at an intersection is based on the warrants stated in this Manual and in the Manual On Uniform Traffic Control Devices published by the Federal Highway Administration (FHWA). The decision to install a signal should not be based solely upon the warrants, since the installation of traffic signals may increase certain types of collisions. Delay, congestion, approach conditions, driver confusion, future land use or other evidence of the need for right of way assignment beyond that which could be provided by stop signs must be demonstrated. See Section 4-03 of this Manual for stop sign warrants.

When the 85th percentile speed of traffic on the major street exceeds 64 km/h in either an urban or rural area, or when the intersection lies within the built-up area of an isolated community having a population of less than 10,000, the location is considered rural. All other areas are considered urban.

3. The total entering volume serviced during the hour equals or exceeds 800 vph for intersections with four or more approaches or 650 vph for intersections with three approaches.

#### K. Warrant 11 - Peak Hour Volume Warrant.

The Peak Hour Volume Warrant is intended for application where traffic conditions are such that for one hour of the day minor street traffic suffers undue delay in entering or crossing the major street.

The peak hour volume warrant is satisfied when the plotted point, representing the vehicles per hour on the major street (total of both approaches) and the corresponding vehicles per hour on the higher volume minor street approach (one direction only) for one hour (any four consecutive 15-minute periods) of an average day, falls above the curve in Figure 9-8 for the existing combination of approach lanes.

When the 85th percentile speed of major street traffic exceeds 64 km/h, or when the intersection lies within a built-up area of an isolated community having a population of less than 10,000, the peak hour volume warrant is satisfied when the plotted point, referred to above, falls above the curve in Figure 9-9 for the existing combination of approach lanes.

#### 9-01.3 Guidelines for Left-Turn Phases

Since separate signal phases for protected left turns will reduce the green time available for other phases, alternate means of handling left turn conflicts should be considered first.

The most likely possibilities are:

1. Prohibition of left turns. This can be done only if there are convenient alternate means of making the movement. Typical alternate means are:

- A series of right and/or left turns around a block to permit getting to the desired destination; or
- b. Making the left turn at an adjacent unsignalized intersection during gaps in the opposing through traffic.
- 2. Geometric changes to eliminate the left turn. An effective change would be a complete separation or a complete or partial "clover leaf" at grade. Any of these, while eliminating left turns, requires additional cost and right of way.
- 3. Provide protected-permissive or permissiveprotected left turn operation. The protected left turn interval may be prohibited during certain periods of the day to allow only permissive intervals for left turn movement in order to increase the green time available for other phases. Refer to Section 9-03.8 for the requirements of protected-permissive or permissive-protected left turn operation.

Protected left turn phases should be considered where such alternatives cannot be utilized, and one or more of the following conditions exist:

- 1. Accidents. Five or more left turn accidents for a particular left turn movement during a recent 12-month period.
- 2. Delay. Left-turn delay of one or more vehicles which were waiting at the beginning of the green interval and are still remaining in the left turn lane after at least 80% of the total number of cycles for one hour.
- 3. Volume. At new intersections where only estimated volumes are available, the following criteria may be used. For a

Figure 9-1
TRAFFIC SIGNAL WARRANTS

		•	TRAFFIC S	SIGNAL	WARF	RANTS		
Critic	JEFFEI HETZLE cal speed of maj	RSON B ROAL or street traffic	(PM ) > 64 km/h nity of < 10,000		Critical A	Approach Spee		04 04 — km/h — km/h
WARRA	NT 1 - Minim					6 SATISFIEI % SATISFIEI		NO   ON
		MINIMUM REC (80% SHOWN	NUIREMENTS IN BRACKETS)					
		U R	U R			, ,		
	APPROACH LANES	1	2 or more			_/_/		Hour
	Both Apprchs. Major Street	500 350 (400) (280)	600 420 (480) (336)					·
	Highest Apprch. Minor Street	150   105 (120)   (84)	200   140 (160) (112)					
WARR	ANT 2 - Intern	MINIMUM REC	DUIREMENTS IN BRACKETS)	fic		% SATISFIE % SATISFIE	_	NO 🗆
	APPROACH LANES	1	2 or more	/-	//	//	///	Hour
	Both Approhs. Major Street	750 525 (600) (420)	900 630 (720) (504)					
	Highest Approh. Minor Street	75 53 (60) (42)	100 70 (80) (56)					
WARR	ANT 3 - Minim				100%	% SATISFIE	D YES 🗆	NO □
	'	REC	DUIREMENT			FULF	ILLED	
		any four hour	ing the major str s or is 190 or mo			Yes 🗆	No 🗆	
			aps per hour in the ngth for pedestri			Yes 🗆	No 🗆	. '
	The neares than 90 m		along the major	street is gre	ater	Yes 🗆	No 🗆	
		affic signal will	not seriously di	srupt progre	ssive	Yes 🗆	No 🔲	

The satisfaction of a warrant is not necessarily justification for a signal. Delay, congestion, confusion or other evidence of the need for right-of-way assignment must be shown.

# Figure 9-3 TRAFFIC SIGNAL WARRANTS

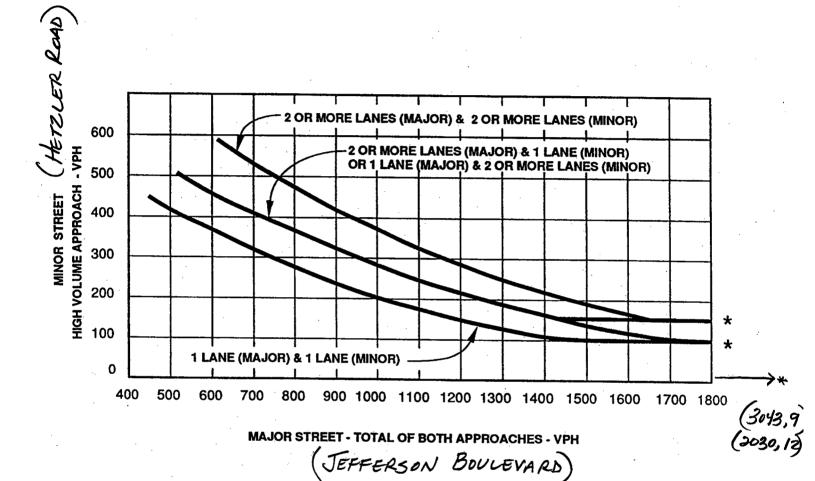
WARRANT 8 - Combination	on of Warrants			S	ATISF	IED	YES		NO	
REQUIREMENT	W	ARRAN	r			1	FL	JLFILL	ED	
TWO WARRANTS	1. MINIMUM VEHICUL	AR VOL	UME							
SATISFIED 80%	2. INTERRUPTION O	F CONT	INUOUS	TRAFF	c		YES		NO	
WARRANT 9 - Four Hou	Volume	·		S	ATISI	FIED*	YES		NO	
Approa	ch Lanes	One	2 or more					Ho	ur	
Both Approaches - Maj	or Street									
Highest Approaches - Min	or Street									
<ol> <li>The total delay experien STOP sign equals or ex- vehicle-hours for a two-l</li> <li>The volume on the same</li> </ol>	ARTS MUST BE SATIS  ced for traffic on one m ceeds four vehicle-houl ane approach; AND  e minor street approac	ninor strength	one-land s or exc	oach co e approa	ach ar	ed by a	YES a YES		NO	
<ul><li>one moving lane of traff</li><li>3. The total entering volumers for intersections with for</li></ul>	me serviced during the	hour eq	uais or	exceed:	s 800 s	vph with	YES		NO	
THE WIPROUT COMMENT OF THE PERSON BLVD @ Approace	T TRAFFIC VO Ir Volume HETZLER RD)		·		<b>ATIS</b> I	rırn*	YES	Ho	NO	
Both Approaches - Maj	or Street		X	3043	2030					
Highest Approaches - Min	or Street	X		9	12					٠

The satisfaction of a warrant is not necessarily justification for a signal. Delay, congestion, confusion or other evidence of the need for right-of-way assignment must be shown.

<sup>\*</sup> Refer to Figure 9-8 (URBAN AREAS) or Figure 9-9 (RURAL AREAS) to determine if this warrant is satisfied.

7-199

# Figure 9-8 PEAK HOUR VOLUME WARRANT (Urban Areas)



\* NOTE:

150 VPH APPLIES AS THE LOWER THRESHOLD VOLUME FOR A MINOR STREET APPROACH WITH TWO OR MORE LANES AND 100 VPH APPLIES AS THE LOWER THRESHOLD VOLUME FOR A MINOR STREET APPROACHING WITH ONE LANE.

# APPENDIX E AIR QUALITY CALCULATIONS

Page: 1

### URBEMIS 2002 For Windows 7.4.2

File Name:

P:\2003\3J051 Baldwin Hills\Technical Reports\Baldwin Hills Construction AIR URBEMIS

Project Name: Baldwin Hills Scenic Overlook
Project Location: South Coast Air Basin (Los Angeles area)
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT (Pounds/Day - Summer)

CONSTRUCTION	EMISSION	ESTIMATES

*** 2004 *** TOTALS (lbs/day,unmitigated) TOTALS (lbs/day, mitigated)	ROG 8.34 7.93	NOx 99.69 65.21	CO 52.45 49.91	SO2 0.63 0.60	PM10 TOTAL 53.53 20.03	PM10 EXHAUST 3.37 0.24	PM10 DUST 50.16 19.80
*** 2005 ***	DOC.	210	90	go2	PM10	PM10	PM10
	ROG	NOx	CO	S02	TOTAL	EXHAUST	DUST
TOTALS (lbs/day,unmitigated)	12.88	90.61	96.55	0.03	4.03	4.02	0.01
TOTALS (lbs/day, mitigated)	12.27	59.96	91.76	0.03	0.34	0.33	0.01

Page: 2

### URBEMIS 2002 For Windows 7.4.2

File Name: P:\2003\3J051 Baldwin Hills\Technical Reports\Baldwin Hills Construction AIR URBEMIS

Project Name: Baldwin Hills Scenic Overlook

Project Location: South Coast Air Basin (Los Angeles area)

On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

#### DETAIL REPORT (Pounds/Day - Summer)

Construction Start Month and Year: March, 2004

Construction Duration: 12

Total Land Use Area to be Developed: 16.5 acres

Maximum Acreage Disturbed Per Day: 5 acres Single Family Units: 0 Multi-Family Units: 0

Retail/Office/Institutional/Industrial Square Footage: 0

#### CONSTRUCTION EMISSION ESTIMATES UNMITIGATED (lbs/day)

CONSTRUCTION EMISSION ESTIMA	TES UNMITIC	GATED (IDS.	/day)				
Source *** 2004***	ROG	NOx	со	S02	PM10 TOTAL	PM10 EXHAUST	PM10 DUST
Phase 1 - Demolition Emission	ns'						
Fugitive Dust	_	_	_	_	0.00	_	0.00
Off-Road Diesel	0.00	0.00	0.00	_	0.00	0.00	0.00
On-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Phase 2 - Site Grading Emiss:	ions						
Fugitive Dust	_	-	-	-	50.00	_	50.00
Off-Road Diesel	6.07	49.88	42.51	-	2.37	2.37	0.00
On-Road Diesel	2.19	49.65	8.23	0.63	1.16	1.00	0.16
Worker Trips	0.08	0.16	1.71	0.00	0.00	0.00	0.00
Maximum lbs/day	8.34	99.69	52.45	0.63	53.53	3.37	50.16
Phase 3 - Building Construct:		40.00					
Bldg Const Off-Road Diesel	5.02	42.03	34.52	-	2.00	2.00	0.00
Bldg Const Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Arch Coatings Off-Gas Arch Coatings Worker Trips	0.00 0.00	-	-			-	-
Asphalt Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Asphalt Off-Road Diesel	0.00	0.00	0.00	_	0.00	0.00	0.00
Asphalt On-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Asphalt Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	5.02	42.03	34.52	0.00	2.00	2.00	0.00
Max lbs/day all phases	8.34	99.69	52.45	0.63	53.53	3.37	50.16
*** 2005***							
Phase 1 - Demolition Emission							
Fugitive Dust Off-Road Diesel	0.00	0 00		_	0.00	-	0.00
On-Road Diesel	0.00	0.00 0.00	0.00	- 0.00	0.00	0.00	0.00
Worker Trips	0.00	0.00	0.00 0.00	0.00 0.00	0.00	0.00 0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00 0.00	0.00	0.00 0.00
Phase 2 - Site Grading Emiss	iona						
Fugitive Dust	TOIIS	_	_		0.00	_	0.00
Off-Road Diesel	0.00	0.00	0.00	_	0.00	0.00	0.00
On-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Phase 3 - Building Construct:	ion						
Bldg Const Off-Road Diesel	5.02	40.35	35.71	_	1.85	1.85	0.00
Bldg Const Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Arch Coatings Off-Gas	0.00	_	_	-	-	-	-
Arch Coatings Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Asphalt Off-Gas	0.45	-	_	_	_	_	-
Asphalt Off-Road Diesel	7.26	48.10	60.03	_	2.12	2.12	0.00
Asphalt On-Road Diesel	0.11	2.14	0.40	0.03	0.05	0.05	0.00
Asphalt Worker Trips	0.03	0.02	0.40	0.00	0.01	0.00	0.01
Maximum lbs/day	12.88	90.61	96.55	0.03	4.03	4.02	0.01
Max lbs/day all phases	12.88	90.61	96.55	0.03	4.03	4.02	0.01

#### Phase 1 - Demolition Assumptions: Phase Turned OFF

Phase 2 - Site Grading Assumptions

Start Month/Year for Phase 2: Mar '04 Phase 2 Duration: 2 months On-Road Truck Travel (VMT): 1522

Off-Road Equipment

No.	Type	Horsepower	Load Factor	Hours/Day
1	Graders	174	0.575	8.0
1	Rubber Tired Dozers	352	0.590	8.0
1	Tractor/Loaders/Backhoes	79	0.465	8.0

Phase 3 - Building Construction Assumptions Start Month/Year for Phase 3: May  $^{\circ}04$ 

Phase 3 Duration: 10 months

Start Month/Year for SubPhase Building: May '04

SubPhase Building Duration: 10 months

Off-Road Equipment

No.	Туре	Horsepower	Load Factor	Hours/Dav
2	Concrete/Industrial saws	84	0.730	8.0
1	Other Equipment	190	0.620	8.0
1	Rough Terrain Forklifts	94	0.475	8.0
Start M	Ionth/Year for SubPhase Architectura	l Coatings: Ja	m 105	

SubPhase Architectural Coatings Duration: 2 months Start Month/Year for SubPhase Asphalt: Jan '05 SubPhase Asphalt Duration: 1 months

Acres to be Paved: 3.8

						-
Off-Ro	ad	Ear	ıiı	om	ent	

Jo.	Туре	Horsepower	Load Factor	Hours/Day
1	Graders	174	0.575	8.0
1	Off Highway Trucks	417	0.490	8.0
1	Paving Equipment	111	0.530	8.0
1	Rollers	114	0.430	8.0

Changes made to the default values for Land Use Trip Percentages The Primary Trip % for Blank changed from 90 to 45 The Diverted Trip % for Blank changed from 10 to 45 The Pass-By Trip % for Blank changed from 0 to 10 Changes made to the default values for Construction The user has overridden the Default Phase Lengths Phase 2 mitigation measure Soil Disturbance: Apply soil stabilizers to inactive areas has been changed from off to on. Phase 2 mitigation measure Soil Disturbance: Replace ground cover in disturbed areas quickly has been changed from off to on. Phase 2 mitigation measure Soil Disturbance: Water exposed surfaces - 2x daily has been changed from off to on. Phase 2 mitigation measure Off-Road Diesel Exhaust: Use aqueous diesel fuel has been changed from off to on. Phase 2 mitigation measure Off-Road Diesel Exhaust: Use diesel particulate filter has been changed from off to on. Phase 2 mitigation measure Off-Road Diesel Exhaust: Use diesel oxidation catalyst has been changed from off to on. Phase 2 mitigation measure On-Road Diesel Exhaust: Use aqueous diesel fuel has been changed from off to on. Phase 2 mitigation measure On-Road Diesel Exhaust: Use diesel particulate filter has been changed from off to on. Phase 2 mitigation measure On-Road Diesel Exhaust: Use diesel oxidation catalyst has been changed from off to on. Phase 2 mitigation measure Off-Road Diesel Exhaust: Properly Maintain Equipment has been changed from off to on. Phase 2 mitigation measure On-Road Diesel Exhaust: Properly Maintain Equipment has been changed from off to on. Phase 3 mitigation measure Off-Road Diesel Exhaust: Use aqueous diesel fuel has been changed from off to on. Phase 3 mitigation measure Off-Road Diesel Exhaust: Use diesel particulate filter has been changed from off to on. Phase 3 mitigation measure Off-Road Diesel Exhaust: Use lean-NOx catalyst has been changed from off to on. Phase 3 mitigation measure Off-Road Diesel Exhaust: Use aqueous diesel fuel has been changed from off to on. Phase 3 mitigation measure Off-Road Diesel Exhaust: Use diesel particulate filter

has been changed from off to on.

Phase 3 mitigation measure Off-Road Diesel Exhaust: Use lean-NOx catalyst

Phase 3 mitigation measure Off-Road Diesel Exhaust: Properly Maintain Equipment

Phase 3 mitigation measure Off-Road Diesel Exhaust: Properly Maintain Equipment

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### URBEMIS 2002 For Windows 7.4.2

File Name:

P:\2003\3J051 Baldwin Hills\Technical Reports\Baldwin Hills Operation AIR URBEMIS

Project Name: Baldwin Park Operation
Project Location: South Coast Air Basin (Los Angeles area)
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT (Pounds/Day - Summer)

AREA SOURCE EMISSION ESTIMATES					
	ROG	NOx	CO	SO2	PM10
TOTALS (lbs/day,unmitigated)	0.07	0.01	0.48	0.00	0.00
TOTALS (lbs/day, mitigated)	0.00	0.00	0.00	0.00	0.00
OPERATIONAL (VEHICLE) EMISSION E	STIMATES				
	ROG	NOx	CO	SO2	PM10
TOTALS (lbs/day,unmitigated)	5.22	5.46	58.11	0.05	4.92
TOTALS (lbs/day, mitigated)	5.15	5.36	57.03	0.05	4.83
SUM OF AREA AND OPERATIONAL EMIS	SION ESTIM	ATES			
	ROG	NOx	CO	S02	PM10
TOTALS (lbs/day,unmitigated)	5.29	5.46	58.59	0.05	4.93
TOTALS (lbs/day, mitigated)	5.15	5.36	57.03	0.05	4.83

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### URBEMIS 2002 For Windows 7.4.2

File Name:

P:\2003\3J051 Baldwin Hills\Technical Reports\Baldwin Hills Operation AIR URBEMIS

Project Name: Baldwin Park Operation
Project Location: South Coast Air Basin (Los Angeles area)
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

DETAIL REPORT (Pounds/Day - Summer)

AREA SOURCE EMISSION ESTIMATES	(Summer	Pounds per	Day, Unmiti	gated)	
Source	ROG	NOx	CO	SO2	PM10
Natural Gas	0.00	0.00	0.00	_	0.00
Wood Stoves - No summer emissi	ons				
Fireplaces - No summer emission	ns				
Landscaping	0.07	0.01	0.48	0.00	0.00
Consumer Prdcts	0.00	_	_	_	_
TOTALS(lbs/day,unmitigated)	0.07	0.01	0.48	0.00	0.00

#### UNMITIGATED OPERATIONAL EMISSIONS

Park Visitor Center City park	ROG 1.86 3.36	NOx 2.28 3.18	CO 24.39 33.71	SO2 0.02 0.03	PM10 2.07 2.86
TOTAL EMISSIONS (lbs/day)	5.22	5.46	58.11	0.05	4.92

Does not include correction for passby trips. Does not include double counting adjustment for internal trips.

OPERATIONAL (Vehicle) EMISSION ESTIMATES

Analysis Year: 2006 Temperature (F): 90 Season: Summer

EMFAC Version: EMFAC2002 (9/2002)

Summary of Land Uses:

Unit Type	Trip Rate	Size	Total Trips
Park Visitor Center	21.75 trips / 1000 sq. ft.	10.30	224.03
City park	5.66 trips / acres	58.00	328.28

Vehicle Assumptions:

Fleet Mix:

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	55.60	2.20	97.30	0.50
Light Truck < 3,750 lb	s 15.10	4.00	93.40	2.60
Light Truck 3,751- 5,75	0 15.90	1.90	96.90	1.20
Med Truck 5,751-8,50	0 7.00	1.40	95.70	2.90
Lite-Heavy 8,501-10,00	0 1.10	0.00	81.80	18.20
Lite-Heavy 10,001-14,00	0 0.30	0.00	66.70	33.30
Med-Heavy 14,001-33,00	0 1.00	10.00	20.00	70.00
Heavy-Heavy 33,001-60,00	0 0.90	0.00	11.10	88.90
Line Haul > 60,000 lb	s 0.00	0.00	0.00	100.00
Urban Bus	0.10	0.00	0.00	100.00
Motorcycle	1.70	82.40	17.60	0.00
School Bus	0.10	0.00	0.00	100.00
Motor Home	1.20	0.00	91.70	8.30

Travel Conditions

	Residential			Commercial		
	Home-	Home-	Home-			
	Work	Shop	Other	Commute	Non-Work	Customer
Urban Trip Length (miles)	11.5	4.9	6.0	10.3	5.5	5.5
Rural Trip Length (miles)	11.5	4.9	6.0	10.3	5.5	5.5
Trip Speeds (mph)	35.0	40.0	40.0	40.0	40.0	40.0
% of Trips - Residential	20.0	37.0	43.0			
% of Trips - Commercial (by land use)						
Park Visitor Center				12.0	6.0	82.0
City park				5.0	2.5	92.5

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Changes made to the default values for Land Use Trip Percentages

The Primary Trip % for Blank changed from 90 to 70 The Diverted Trip % for Blank changed from 10 to 25 The Pass-By Trip % for Blank changed from 0 to 5

Changes made to the default values for Area

The wood stove option switch changed from on to off.
The fireplcase option switch changed from on to off.
The area souce mitigation measure option switch changed from off to on.
The landscape year changed from 2004 to 2006.
Mitigation measure All Electric Landscape Maintenance Equipment: Rsdntl Lndscp Maint.
has been changed from off to on.
Mitigation measure All Electric Landscape Maintenance Equipment: Cmrcl Lndscp Maint.
has been changed from off to on.

Changes made to the default values for Operations

The operational emission year changed from 2004 to 2006.

The travel mode environment settings changed from both to: none
The default/nodefault travel setting changed from nodefault to: default
Visually Interesting Uses: No Uses Within Walking Distance
changed to: Visually Interesting Uses: No Uses within Walking Distance